

Letter of Response

November 8, 2024
Via Electronic Mail

Newton Conservation Commission
Planning & Development Department
1000 Commonwealth Avenue
Newton, MA 02459

Attention: Jennifer Steel, Ellen Menounos and Members of the Newton Conservation Commission

**RE: Response to Comments Letter
Wetland and Engineer Peer Review
528 Boylston Street
Newton, Massachusetts**

Dear Jennifer Steel, Ellen Menounos and Members of the Newton Conservation Commission:

Please allow this letter to serve as our formal response to your letter dated October 3, 2024 regarding the Wetland and Engineer Peer Review prepared by BSC Group, Inc. (BSC), for the above referenced project. For your reference, BSC's conclusions are denoted in under-lined font BSC's recommendations are denoted in *italic* font and Bohler's the responses are shown in bold font type.

As discussed during our October 30, 2024 hearing, the Drainage Report and Site Plan package have been updated to reflect the testing that occurred the week of October 16,2024.

Regulatory Review Comments – Wetlands Protection Act

Riverfront Area General Performance Standards (310 CMR 10.58(4)(a-d))

1. The following provides comments on compliance with the performance standards as the provided in the most recent submittals. Please note that although (c) and (d) are not applicable to this project¹, they have been met.

- (a) Protection of Other Resource Areas. The work shall meet the performance standards for all other resource areas within the Riverfront Area. When work in the Riverfront Area is also within the buffer zone to another resource area, the performance standards for the Riverfront Area shall contribute to the protection of the interests of M.G.L. c. 131, § 40 in lieu of any additional requirements that might otherwise be imposed on work in the buffer zone within the Riverfront Area.

BSC Conclusion: Based on the Proposed Project, work will occur within Riverfront Area, Bordering Land Subject to Flooding, Bordering Vegetated Wetland and Buffer Zone to Bordering Vegetated Wetland and Inland Bank. The project meets the performance standards for BVW and Bordering Land Subject to Flooding (310 CMR 10.57(4)(a), see details below.

Bohler Response: No response required.

- (b) Protection of Rare Species. No project may be permitted within the Riverfront Area which will have any adverse effect on specified habitat sites of rare wetland or upland, vertebrate or invertebrate species, as identified by the procedures established under 310

CMR 10.59 or 10.37, or which will have any adverse effect on vernal pool habitat certified prior to the filing of the Notice of Intent.

BSC Conclusion: The Project Area is not mapped as NHESP Estimated or Priority Habitat for Rare Species and no vernal pools are present.

Bohler Response: No response required.

- (c) Practicable and Substantially Equivalent Economic Alternatives. There must be no practicable and substantially equivalent economic alternative to the proposed project with less adverse effects on the interests identified in M.G.L. c. 131 § 40.

BSC Recommendation: The Applicant has provided an alternatives analysis (Section 5 of the NOI application) that provides a brief summary of the No-build (Alternative 1), larger building footprint and other developed facilities (Alternative 2) and the proposed project (Alternative 3). The analysis demonstrates that the proposed project will provide floodplain compensation, wetland, buffer zone and riverfront area enhancement plantings and stormwater management that will result in less adverse effects on the interests of the Act than either Alternative 1 or 2. Therefore, this standard is being met.

Bohler Response: No response required.

- (d) No Significant Adverse Impact. The work, including proposed mitigation measures, must have no significant adverse impact on the Riverfront Area to protect the interests identified in M.G.L. c. 131, § 40.

Within 200 foot Riverfront Areas, the issuing authority may allow the alteration of up to 5,000 square feet or 10% of the Riverfront Area within the lot, whichever is greater, on a lot recorded on or before October 6, 1997 or lots recorded after October 6, 1997 subject to the restrictions of 310 CMR 10.58(4)(c)2.b.vi., or up to 10% of the Riverfront Area within a lot recorded after October 6, 1997, provided that:

- a. If there is not a 100-foot-wide area of undisturbed vegetation within the Riverfront Area, existing vegetative cover shall be preserved or extended to the maximum extent feasible to approximate a 100-foot-wide corridor of natural vegetation. Replication and compensatory storage required to meet other resource area performance standards are allowed within this area; structural stormwater management measures may be allowed only when there is no practicable alternative.

BSC Conclusion: The Applicant is proposing native plantings and a bioretention area within the 100-foot Inner Riparian Zone which will increase the wildlife habitat functions of the site in addition to improving the stormwater management system of the site. Therefore, this standard is being met.

Bohler Response: No response required.

- b. Stormwater is managed according to standards established by the Department in its Stormwater Policy.

BSC Recommendation: See the Engineering and Stormwater Review Comments below.

Bohler Response: Further responses detailed below.

- c. Proposed work does not impair the capacity of the Riverfront Area to provide important wildlife habitat functions.

BSC Conclusion: The Applicant is proposing invasive species management, native plantings and a bioretention area within the 100-foot Inner Riparian Zone which will increase the wildlife habitat functions of the site. All new development and activities are located in the Outer Riparian Zone and outside of the Riverfront Area. Therefore, this standard is being met.

Bohler Response: No response required.

- d. Proposed work shall not impair groundwater or surface water quality by incorporating erosion and sedimentation controls and other measures to attenuate nonpoint source pollution.

BSC Conclusion: The Applicant is proposing erosion and sediment controls during construction, as well as stormwater improvements that incorporate infiltration and biofiltration. Therefore, this standard is being met.

Bohler Response: No response required.

Previously Developed and Degraded Riverfront Area Performance Standards (310 CMR 10.58(5)(a-h))

2. Compliance with the performance standards under 310 CMR 10.58(5) needs to be demonstrated. The following provides comments on compliance with the performance standards.

- (a) At a minimum, proposed work shall result in an improvement over existing conditions of the capacity of the Riverfront Area to protect the interests identified in M.G.L. c. 131 § 40.

BSC Recommendation: Based on the current project plans and the site visit, the current conditions of the Riverfront Area are impaired by an existing structure, pavement, and landscaping material stock piles within the 100-foot Inner Riparian Zone, as well as debris/spoil piles and a plant community dominated by invasive species. The proposed project will move all structures and pavement outside of the 100-foot Inner Riparian Zone, removal of debris/spoil piles, invasive species management and native planting. Therefore, BSC agrees that the project will result in an overall improvement of the capacity of the Riverfront Area associated with Paul Brook to protect the interests of the Act.

Bohler Response: No response required.

- (b) Stormwater management is provided according to standards established by the Department.

BSC Conclusion: See the Engineer Review and Stormwater Review Comments below.

Bohler Response: Further responses detailed below.

- (c) Within 200-foot Riverfront Areas, proposed work shall not be located closer to the river than existing conditions or 100 feet, whichever is less, or not closer than existing conditions within 25-foot Riverfront Areas, except in accordance with 310 CMR 10.58(5)(f) or (g).

BSC Recommendation: Based on the current project plans, BSC agrees that work is not proposed closer to Paul Brook than existing conditions. There is an existing building and retaining wall currently located closer to the river which will be removed, and all proposed

structures (excluding the bioretention area) are located outside of the 100-foot Inner Riparian Zone.

Bohler Response: No response required.

- (d) Proposed work, including expansion of existing structures, shall be located outside the Riverfront Area or toward the Riverfront Area boundary and away from the river, except in accordance with 310 CMR 10.58(5)(f) or (g).

BSC Conclusion: BSC agrees that the proposed work has been designed to be located outside of the 100-foot Inner Riparian Zone and away from the Brook.

Bohler Response: No response required.

- (e) The area of proposed work shall not exceed the amount of degraded area, provided that the proposed work may alter up to 10% if the degraded area is less than 10% of the Riverfront Area, except in accordance with 310 CMR 10.58(5)(f) or (g).

BSC Conclusion: The site currently has 32,042 sf of existing degraded Riverfront Area and the proposed conditions will have 21,517 sf of degraded Riverfront Area. There will be a 10,525-sf reduction in degraded Riverfront Area. BSC agreed this standard has been met.

Bohler Response: No response required.

- (f) When an applicant proposes restoration on-site of degraded Riverfront Area, alteration may be allowed notwithstanding the criteria of 310 CMR 10.58(5)(c), (d), and (e) at a ratio in square feet of at least 1:1 of restored area to area of alteration not conforming to the criteria. Areas immediately along the river shall be selected for restoration. Alteration not conforming to the criteria shall begin at the Riverfront Area boundary.
- a. Restoration shall include:
1. removal of all debris, but retaining any trees or other mature vegetation;
 2. grading to a topography which reduces runoff and increases infiltration;
 3. coverage by topsoil at a depth consistent with natural conditions at the site; and
 4. seeding and planting with an erosion control seed mixture, followed by plantings of herbaceous and woody species appropriate to the site.

BSC Conclusion: Based on the current project plans, the Project will result in a reduction of degraded Riverfront Area and therefore restoration is not required.

Bohler Response: No response required.

- (g) When an applicant proposes mitigation either on-site or in the Riverfront Area within the same general area of the river basin, alteration may be allowed notwithstanding the criteria of 310 CMR 10.58(c), (d), or (e) at a ratio in square feet of at least 2:1 of mitigation area to area of alteration not conforming to the criteria or an equivalent level of environmental protection where square footage is not a relevant measure. Alteration not conforming to the criteria shall begin at the Riverfront Area boundary. Mitigation may include off-site restoration of Riverfront Areas, conservation restrictions under M.G.L. c. 184, §§31 through 33 to preserve undisturbed Riverfront Areas that could be otherwise altered under 310 CMR 10.00, the purchase of development rights within the Riverfront Area, the restoration of bordering vegetated wetland, projects to remedy an existing adverse impact on the interests identified in M.G.L. c. 131 §40 for which the applicant is not legally responsible, or similar activities undertaken voluntarily by the applicant which will support a determination by the issuing authority of no significant adverse impact. –

BSC Conclusion: Based on the current project plans, the Project will result in a 10,525 sf reduction of degraded Riverfront Area, therefore mitigation is not required; nevertheless, the project includes 27,200 sf mitigation in the form of invasive species management and native planting in Riverfront Area.

Bohler Response: No response required.

- (h) The issuing authority shall include a continuing condition in the Certificate of Compliance for projects under 310 CMR 10.58(5)(f) or (g) prohibiting further alteration within the restoration or mitigation area, except as may be required to maintain the area in its restored or mitigated condition. Prior to requesting the issuance of the Certificate of Compliance, the applicant shall demonstrate the restoration or mitigation has been successfully completed for at least two growing seasons.

BSC Recommendation: BSC recommends that the Order of Conditions include a continuing condition in the Certificate of Compliance for projects under 310 CMR 10.58(5)(f) or (g) prohibiting further alteration within the restoration or mitigation area, except as may be required to maintain the area in its restored or mitigated condition.

Bohler Response: No response required.

Bordering Land Subject to Flooding (310 CMR 10.57(4)(a)(1-3))

3. The following provides comments on compliance with the performance standards as provided in the most recent submittals.
- (a) Compensatory storage shall be provided for all flood storage volume that will be lost as the result of a proposed project within Bordering Land Subject to Flooding, when in the judgment of the issuing authority said loss will cause an increase or will contribute incrementally to an increase in the horizontal extent and level of flood waters during peak flows.

BSC Conclusion: BSC agrees with the Applicant's Cut and Fill Analysis to meet this standard. There will be a total net increase of 6,025 cf in BLSF on site. This will result in an increase in flood storage volume capacity. BSC notes this requirement is met.

Bohler Response: No response required.

- (b) Work within Bordering Land Subject to Flooding, including that work required to provide the above- specified compensatory storage, shall not restrict flows so as to cause an increase in flood stage or velocity.

BSC Conclusion: Compensatory flood storage is being provided adjacent to Paul Brook and includes the removal of historic fill which will alleviate existing restrictions to flow and improve the hydrologic connection between Paul Brook and the adjacent BVW, therefore, BSC agrees that the project will not restrict flows or increase the flood stage or velocity.

Bohler Response: No response required.

- (c) Work in those portions of Bordering Land Subject to Flooding found to be significant to the protection of wildlife habitat shall not impair its capacity to provide important wildlife

habitat functions. Except for work which would adversely affect vernal pool habitat, a project or projects on a single lot, for which Notice(s) of Intent is filed on or after November 1, 1987, that (cumulatively) alter(s) up to 10% or 5,000 square feet (whichever is less) of land in this resource area found to be significant to the protection of wildlife habitat, shall not be deemed to impair its capacity to provide important wildlife habitat functions. Additional alterations beyond the above threshold, or altering vernal pool habitat, may be permitted if they will have no adverse effects on wildlife habitat, as determined by procedures contained in 310 CMR 10.60.

BSC Conclusion: BSC agrees that the proposed project and mitigation activities will not impair the capacity of the BLSF to provide important wildlife habitat functions over existing conditions and will improve the habitat functions by managing the invasive species and adding a diverse mix of native understory species.

Bohler Response: No response required.

Floodplain/Watershed Protection Provisions (Newton Wetland Ordinance Sec. 22- 22)

4. Flood storage volume was calculated using the more conservative elevation - 127.5 City of Newton Datum (~121 NAVD88) - established under the City of Newton's Floodplain Ordinance as because it exceeds the FEMA mapping which establishes it at El. 126.0 (City of Newton Base) or 120.28 (NAVD88).

Under the Newton Conservation Commission's policy, compensatory flood storage volume for all new fill in floodplain must be provided at 110%.

BSC Conclusion: The project proposes to fill 3,279 cubic yards and to cut 9,304 cubic feet, exceeding the required 110% compensatory flood storage on site. BSC notes this requirement is met.

Bohler Response: No response required.

Engineering Review and Stormwater Report Comments

5. BSC Conclusion: The Drainage Report includes sufficient information and calculations to demonstrate compliance with Stormwater Standard 1.

Bohler Response: No response required.

6. BSC Conclusion: The Drainage Report includes calculations demonstrating reduction of peak runoff rates in accordance with Stormwater Standard 2 and reduction in runoff volumes in accordance with City of Newton Stormwater Management and Erosion Control Rules & Regulations (Rules & Regulations) Section 5B.6. We offer the following comments and questions that may impact these calculations:

- (a) *BSC Recommendation: Subcatchment EX-3 in the existing conditions HydroCAD computations discharges into the rear of properties on Hagen Road. While this discharge may ultimately flow to Paul Brook through the Newton drainage system, we believe that a new design point at Hagen Road would be appropriate to more accurately determine if Standard 2 is met at all off-site discharge points.*

Bohler Response: The HydroCAD model and supporting documentation within the enclosed Drain Report have been updated to reflect a more appropriate design

point at the confluence of Paul Brook and the Hagen Road closed pipe connection located within Hagen Road.

- (b) BSC Conclusion: With the additional design point referenced above, proposed conditions Subcatchment PR6 may need to be split into two subcatchments – one for the runoff collected and routed towards Paul Brook and one for the runoff that will continue to flow towards the rear of the properties on Hagen Road.

Bohler Response: The existing and proposed subcatchments have been updated to reflect the change to the design point noted in response 6a above.

- (c) BSC Conclusion: Portions of off-site topography are taken from sources other than the existing conditions survey for the site.

BSC Recommendation: We request the Applicant provide the source of this topography. Additionally, has the Applicant performed any on-site verification that this topography, which appears to pre-date the homes and road off Dudley Road, does generally match the source material?

Bohler Response: The off-site topography was obtained from The National Oceanic and Atmospheric Administration (NOAA)'s LiDAR data base and converted to City of Newton base. Several site visits have been conducted that are able to generally verify that the shown topography matches the existing conditions of the homes off Dudley Road and other relevant areas.

- (d) *BSC Recommendation: While it is a minor difference, the existing and proposed conditions area of HSG A and HSG D soils do not match. As soil types do not change after construction, these areas must be the same in both existing and proposed conditions.*

Bohler Response: The HydroCAD within the enclosed Drain Report has been revised to ensure that the existing and proposed HSG A and HSG D match.

- (e) BSC Conclusion: Proposed conditions Subcatchment PR1a contains unchanged areas of existing conditions Subcatchment EX-1. The time of concentration (Tc) for Subcatchment PR1a is 11.4 minutes while the Tc for Subcatchment EX-1 is 6.1 minutes. As the Tc flow path for Subcatchment PR1a is within Subcatchment EX-1, the flow path exists in Subcatchment EX-1.

BSC Recommendation: As Tc is the time for runoff to travel to the hydraulically most distant point, not necessarily the physically most distant, we believe that a Tc of 11.4 minutes is more appropriate for Subcatchment EX-1 and recommend the calculations be revised accordingly.

Bohler Response: The Tc's for Subcatchment EX-1 have been updated and revised calculations are provided within the enclosed Drain Report.

- (f) BSC Conclusion: Existing conditions Subcatchments EX-1 and EX-3 and proposed conditions Subcatchment PR6 include two segments of sheet flow in their Tc calculations. Use of multiple sheet flow segments is not typical in runoff calculations.

BSC Recommendation: We request the Applicant provide clarification on this.

Bohler Response: Two sheet flow segments were utilized in Tc calculations for EX-1 and EX-3 due to significant grade change within the first 100 feet of flow.

- (g) BSC Conclusion: Existing conditions Subcatchment EX-4 and proposed conditions Subcatchment PR5 use a surface condition of “woods: dense underbrush” in its Tc calculation. According to the Massachusetts Supplement to TR-55, that surface condition should not be used in Massachusetts.

BSC Recommendation: We recommend the calculations be revised to use “woods: light underbrush”.

Bohler Response: All Tc’s for both existing and proposed conditions have been revised, with all “woods: dense underbrush” changed to “woods: light underbrush”. Within the enclosed Drain Report.

7. We offer the following comments and questions regarding the Project’s compliance with Stormwater Standard 3 for infiltration to groundwater:

- h. BSC Conclusion: The Drainage Report includes sufficient information and calculations demonstrating that the Project retains the runoff volume equivalent to 2-inches multiplied by the impervious surfaces on site per the City of Newton’s Stormwater Management and Erosion Control Rules & Regulations Section 5C.3.a). This exceeds the recharge volume required by Stormwater Standard 3.

Bohler Response: No response required.

- i. *BSC Conclusion: Appropriate calculations have been provided demonstrating that each infiltration BMP drains within 72 hours as required.*

Bohler Response: No response required.

- j. BSC Conclusion: Soil test pits were performed by Bohler in December 2023. Per the City of Newton’s Stormwater Management and Erosion Control Rules & Regulations Section 5B.5. requires that any soil tests conducted between June and February must also be accompanied by a determination of the seasonal high groundwater using the Frimpter Method.

BSC Recommendation: No Frimpter Method analysis has been provided.

Bohler Response: A narrative detailing the Frimpter Method calculations performed for test pits in which groundwater was encountered has been provided. The results are generally consistent with the previously identified elevation for seasonal high groundwater.

- k. BSC Conclusion: Several soil test pits have been performed in the area around Subsurface Infiltration System (2P). Due to an existing home in the location of this proposed system, the Applicant has not yet performed test pits within the limits per the requirements of Standard 3.

BSC Recommendation: The Applicant has indicated that additional test pits will be performed after demolition of the home as a condition of approval. Should the Commission agree to such a condition, we recommend that the condition require these test pits to occur at the start of construction and that the soil information be submitted immediately upon completion. Should these test pits show soil or groundwater conditions conflicting with the current design assumptions, the Applicant may need to amend any Order of Conditions issued.

Bohler Response: Additional soil test pits were performed on 10/16 and have been included in this submission. Test pits within the footprint of the existing home will be performed prior to the start of construction.

- l. BSC Conclusion: A groundwater mounding analysis has been performed for Subsurface Infiltration System (2P).

BSC Recommendation: While we concur with the methodology and inputs used for this analysis, it must be noted that the actual results of this analysis cannot be determined until after groundwater and soils information are confirmed through test pits as detailed above.

Bohler Response: Additional soil test pits were performed on 10/16 and have been included in this submission. All systems will be located a minimum of 4-ft above the estimated seasonal high groundwater, therefore, additional mounding analysis are not required.

- m. BSC Conclusion: Only one test pit (SH-TP-10) has been performed in the area of Subsurface Infiltration System (3P). This test pit is located southeast of the proposed system. The proposed system is approximately 100-feet long and there is an approximately 4-foot increase in surface elevation at the opposite end of the system.

BSC Recommendation: As such, we recommend at least one additional test pit be performed in the far end of the system to ensure that groundwater elevations used in design are appropriate.

Bohler Response: Additional soil test pits within the system were performed on 10/16 and have been included in this submission.

- n. BSC Conclusion: One soil boring (SH-3) and one soil test pit (SH-TP-6) were performed in the area of Subsurface Infiltration System (4P). While no groundwater was observed in the boring, soil borings do not allow for observation of redoximorphic features if they exist. Additionally, the test pit was terminated due to refusal 4.8-feet below existing grade.

BSC Recommendation: As such, we recommend additional soil test pits be performed in this area to verify soil and groundwater information used in the design.

Bohler Response: Additional soil test pits were performed on 10/16 and have been included in this submission. System 4P has been modified and relocated west where additional soil boring data from SH-4W encountered groundwater 16.7' below existing grade (~elevation 122.3).

8. We offer the following comments and questions regarding the Project's compliance with Stormwater Standard 4 for water quality:

- o. BSC Conclusion: The Drainage Report includes sufficient information and calculations to demonstrate compliance with the Total Suspended Solids (TSS) removal requirements in Rules & Regulations Section 5.C.3.b).

BSC Recommendation: The 90% TSS removal requirement exceeds the 80% TSS removal requirement of Stormwater Standard 4.

Bohler Response: No response required.

- p. BSC Conclusion: The Drainage Report includes sufficient information and calculations to demonstrate compliance with the Total Phosphorous (TP) removal requirements in Rules & Regulations Section 5.C.3.c).

Bohler Response: No response required.

- q. *BSC Recommendation: The Applicant should provide details on how BMP Treatment Train #1 meets the 44% TSS removal requirement prior to discharge to an infiltration BMP.*

Bohler Response: Treatment Train #1 has been revised so that all impervious area is directed to a water quality unit prior to discharge to an infiltration system.

9. BSC Conclusion: Stormwater Standards 5, 6, and 7 are not applicable to the Project.

Bohler Response: No response required.

10. Appropriate erosion and sediment controls and details conforming to Stormwater Standard 8 are included on the Project Plans. The Drainage Report indicates that a draft stormwater pollution prevention plan (SWPPP) for the Project will be submitted prior the commencement of construction.

BSC Recommendation: We recommend the Commission require that this SWPPP be submitted sufficiently in advance of construction beginning to allow staff to review appropriately.

Bohler Response: A revised SWPPP has been included as an attachment.

Additionally, the Commission requested information on the environmental soil conditions on the site. A Phase I Report has been included in the 10/18/24 Response to Comments and the below summary is an overview of soil handling requirements:

The earthwork contractor should limit off-site disposal of on-site soil to the extent practical by reusing excavated soil as fill above footings and below proposed paved areas. Excess soil that must be hauled off-site will need to be managed in accordance with local, state, and federal environmental regulations including the Massachusetts Contingency Plan (MCP) in 310 CMR 40. Excess soil which cannot be reused as fill on the site will need to be shipped off-site for disposal at a facility permitted to accept the soil based on environmental pre-characterization data obtained for the site.

11. A Stormwater Operation and Maintenance Plan and Long-Term Pollution Prevention Plan meeting the requirements of Stormwater Standard 9 has been provided. We offer the following comments on these plans:

- r. *BSC Recommendation: We recommend that a requirement to remove grass clippings from the rain garden be added to the operation and maintenance (O&M) requirements.*

Bohler Response: This requirement has been added to the O&M plan.

- s. The Stormwater O&M Plan states that parking lots and roadways will be swept at least four (4) times per year while the Long-Term Pollution Prevention Plan (LTPPP) states sweeping will occur a minimum of twice per year.

BSC Recommendation: We recommend these plans be consistent.

Bohler Response: This O&M and LTPPP plans have been updated for consistency.

- t. *BSC Recommendation: We recommend the O&M Plan be updated to prohibit sanding of the porous pavement as sand is likely to clog porous asphalt.*

Bohler Response: This requirement has been added to the O&M plan.

- u. The LTPPP details snow removal and storage.

BSC Conclusion: Where will snow be stored on site?

Bohler Response: Snow storage areas are shown on the revised site plans.

- v. The LTPPP details pet waste disposal.

BSC Conclusion: Will the Project include pet waste disposal bag dispensers for residents?

Bohler Response: The pet waste disposal station was for a prior iteration of the proposed plan that included a dog park which is no longer a part of the proposal. The revised report will correct the discrepancy.

- w. BSC Conclusion: The O&M Plan includes manufacturer's written instructions for all proprietary stormwater BMPs.

Bohler Response: No response required.

12. *BSC Recommendation: An unsigned Illicit Discharge Compliance Statement has been submitted. This must be signed prior to the start of construction to comply with Stormwater Standard 10.*

Bohler Response: Acknowledged. An Illicit Discharge Compliance Statement will be submitted prior to construction.

13. *BSC Recommendation: Pipe sizing calculations demonstrating that piping can carry flows from the 100-year storm event have been provided.*

Bohler Response: No response required.

Upon your review of the above, please do not hesitate to contact me directly with any questions.

Sincerely,
BOHLER ENGINEERING MA, LLC



Timothy Hayes, P.E.



Stephen Martorano, P.E.