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May 13, 2025
GZA Project No. 15.0167424.00

South Hadley Conservation Commission
116 Main Street, Room U6
South Hadley, MA 01075

Re: Wetland Delineation Peer Review
Request for Determination of Applicability and Associated Plan
506 Granby Road, Map 32, Parcel 52
South Hadley, MA

Dear Commission Members:

On behalf of the South Hadley Conservation Commission (SHCC) and in accordance with our contract, GZA is providing this Peer Review letter report in support of the SHCC review of a Request for Determination of Applicability Site Plan prepared by R. Levesque Associates, Inc. (RLA) for SAI SHYAM, LLC. ("Applicant").

The South Hadley Conservation Commission is seeking a review of whether the boundaries of resource areas are accurately delineated at the parcel as submitted in a Request for Determination under the Wetlands Protection Act and South Hadley Wetland Bylaw.

R Levesque Associates, Inc of Westfield, MA has submitted WPA Form 1 Request for Determination of Applicability and associated plan for a wetland delineation of Bordering Vegetated Wetland at 506 Granby Road in South Hadley, MA (Map 32, Parcel 52) on behalf of their client, on behalf SAI Shyam, LLC c/o Mr. Himanshu Patel.

GZA was requested to review the materials submitted for accuracy and completeness with the requirements of the Massachusetts Wetlands Protection Act M.G.L. c 131, sec 40 and associated Regulations 310 CMR 10.00 and Local Wetland Bylaw (Chapter 240) and associated Regulations.

The primary focus of the RDA Peer Review is confirmation of wetland resource boundaries using a methodology that is consistent with the *Massachusetts Handbook for Delineating Bordering Vegetated Wetlands*, Second Edition, Jackson, S.D, D.J. Henson, D. Hilgeman, M. McHugh, and L. Rhodes, 2022, Boston, MA., Massachusetts Department of Environmental Protection, Bureau of Water resources, Wetlands Program; and *Corps of Engineers Wetland Delineation Manual, Environmental Laboratory. Technical Report Y-87-1*. U.S. Army Engineer Waterways Experiment Station, Vicksburg, MS; 2012 *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Northcentral and Northeast Region*, ed. J.S. Wakely, R.W. Lichvar, and C. C. Noble; ERDC/EL TR-12-1. *Vicksburg, MS: U.S. Army Engineer Research and Development Center (Version 2.0)*.



Following our site observation on May 7, 2025, we offer our findings and recommendations to the SHCC for your consideration as you review the above referenced RDA application.

We generally agree with the wetland flagging observed on the site and the flag locations in the field appeared to be consistent with the flagging (listed below) shown on the RDA Site Plan that was provided by the Applicant. However, we had numerous disagreements with the descriptions of resource area types and the internal configuration of the bank and bordering vegetated resource areas. GZA recommends that the RDA site plan be updated by the applicant to provide details about the resource area types and correct some erroneous point connection errors noted in the narrative below. Three wetland flags that were identified on the parcel but not on the site plan should also be addressed to the Commission by the applicant. GZA observed pockets of hydrophytic vegetation within the interior of the parcel south of the stream, however our spot checks did not indicate the presence of hydric soils.

Documents Reviewed for Preliminary Review

As part of this Peer Review, we have considered several documents and online GIS data from the Massachusetts Global Information System (MassGIS) through the MassMapper online access portal. A list of materials reviewed is provided.

1. Conservation Filing Plan (Site Plan) of 506 Granby Road, South Hadley, MA, Map 32 Parcel 52. Prepared by R. Levesque Associates, Inc., Westfield, MA and dated January 28, 2025.
2. Request for Determination of Applicability (Bound Application, Narrative & Supporting Documents, prepared by R. Levesque Associates, Inc., Westfield, MA and dated January 31, 2025.
3. Wetland Determination Data Forms, prepared by R. Levesque Associates, Inc. and dated April 29, 2025.
4. Conservation Filing Plan (Site Plan) of 506 Granby Road, South Hadley, MA, Map 32 Parcel 52. Prepared by R. Levesque Associates, Inc., Westfield, MA and dated May 2, 2025.
5. Desktop Review: MassGIS Data layers including DEP Wetlands, Hydrologic Connection, Orthographic images, NHESP layers, Soils, FEMA Floodplain, Areas of Critical Environmental Concern, Outstanding Resource Waters, and NWI Wetlands. The FEMA Flood Map Service Center, USDA Web Soil Survey, USGS Stream Stats, and Massachusetts Cultural Resource Information System.

Desktop Review

In addition, GZA conducted a desktop review of the Site and areas immediately adjacent to the Site using publicly available databases including MassMapper, MACRIS, MassDOT, FEMA Maps, and Natural Resource Conservation Service Web Survey maps to assess if identified natural resources related or frequently reviewed restrictive features are present on the Site. **Table 1** lists the results of our review. Based on our review of publicly available data sources, GZA identified that the Site contains a MassDEP DEP estimated Freshwater Emergent Wetland located to the north of the site and Freshwater Forested/Shrub wetland located to the southeast of the site. The DEP mapped wetlands are located within 100 feet on the parcel. A hydrologic connection is mapped by MassDEP across the center of the parcel roughly in a east/west orientation. Hydric soils are mapped along the southeast portion of the parcel. The soils on the parcel are mapped as prime farmland soils. No additional environmentally regulated areas were identified based on our desktop review.

See **Table 1** for a summary of the regulated areas on the parcel.



Table 1: Summary of Desktop Survey

Resource	Present
Areas of Critical Environmental Concern (ACEC)	No
Outstanding Resource Water (ORW)	No
Priority Habitat for Rare and Endangered Species	No
Certified Vernal Pools	No
Open Space or Protected Land	No
DCR Trails	No
Mass Historic Commission Inventory	No
Cold Water Fisheries	No
Bank	Yes
Bordering Vegetated Wetland	No (Off-Site Freshwater Emergent wetland to the north, Freshwater Forested/Shrub wetland to the southeast)
Perennial Stream	No
Riverfront Area	No
FEMA Floodplain, 100-year	No
Prime Farmland Soils	Yes
Mapped Hydric Soils	Yes (SE corner)
Surface Water Protection Areas	No
Wellhead Protection Areas	No

On Site Review

GZA conducted a single field review of the Site on May 7, 2025, to inspect the flagged wetland resources and to review upland areas of the parcel. The site was reviewed under the continued moderate drought conditions that our region has been experiencing, however several days of precipitation preceded the site review.

The site contains a mixture of developed and undeveloped land. The front half (north) of the parcel is dominated by a business and associated paved parking area. A long-paved driveway (Conti Drive) traverses the western portion of the site and services a business behind the parcel. The area south of the stream is a composite of successional deciduous tree species and maintained lawn. The parcel is relatively flat, contains an intermittent stream that appears to have been historically over widened and has several storm water inputs.

The RDA plan shows that the site contains a bordering vegetated wetland (BVW) that runs across the property in a roughly east to west orientation. Internal to that wetland the plan identifies areas of bank associated with an intermittent stream. An area of BVW was identified in the southwest portion of the site which connects off-property to the main BVW/stream system. An area of off-site bank was identified near the southeast corner of the parcel which projects buffer zone onto the site.

GZA located most of the wetland flags identified on the RDA plan. Many of the flags were not refreshed and the numbering was not always decipherable, however based on their location and identification of adjacent flags, the sequence was confirmed.



The main east-west area identified on the plans as BVW resource area clearly contained flow on the day of the site review and a defined bank. Based upon a review of the USGS Quadrangle Map for the site and USGS Streamstats, the stream does not qualify as perennial per 310 CMR 10.58(2). The stream appears to have been over widened in the past, possibly at the time when offsite stormwater connections were last installed. GZA observed a wide and relatively flat bottom stream that was deeply incised within a relatively steep bank. The bank confined the stream and was bordered in areas by fringe and pocket bordering vegetated wetlands. Due to the discrepancy of GZA’s resource area finding, we are providing a flag review **Table 2** below and have annotated the RDA plan.

Table 2: GZA Wetland Flag Review Information

Flag ID	RLA Resource	GZA Resource	Notes	Flag ID	RLA Resource	GZA Resource	Notes
A-2	BVW	Bank		B-2	BVW	BVW	
A-3	BVW	Bank		B-3	BVW	BVW	
A-4	BVW	Bank		B-4	BVW	BVW	
A-5	BVW	Bank		B-5	BVW	BVW	
A-6	BVW	Bank		B-6	BVW	BVW	
A-7	BVW	BVW	No Bank flag	B-7	BVW	BVW	
A-8	BVW	BVW	No Bank flag	B-8	BVW	BVW	
A-9	BVW	BVW	No Bank flag	B-9	BVW	BVW	
A-10	BVW	BVW	Bank resumes	B-10	BVW	BVW	
A-11	BVW	BVW		B-11	BVW	BVW	
A-12	BVW	BVW		B-12	BVW	BVW	
A-13	BVW	BVW	Fix connection on plan	B-13	BVW	BVW	
A-14	BVW	BVW		B-16	BVW	BVW	
A-15	BVW	BVW		B-17	BVW	BVW	On ground, needs stake
A-16	BVW	BVW		B-17A	BVW	BVW	
A-17	BVW	BVW		B-18	BVW	BVW	
A-18	BVW	BVW		B-21	BVW	BVW	
A-19	BVW	BVW		B-22	BVW	BVW	
A-20	BVW	BVW		B-23	BVW	BVW	
A-21	BVW	BVW		B-24	BVW	BVW	
A-22	BVW	BVW		B-25	BVW	BVW	
A-23	BVW	Bank		B-26	BVW	BVW	
A-23A	BVW	Bank	This flag was high on the bank	B-27	BVW	BVW	Shift 3’ upgradient to make bend
A-24	BVW	Bank		B-28	BVW	BVW	
A-25	BVW	Bank					
A-26	BVW	Bank					
A-27	BVW	Bank	Connects to A-29 as Bank				
A-28	BVW	BVW					
A-29	BVW	Bank	Connects to A-27 as Bank				
A-30	BVW	BVW					
A-31	BVW	Bank					



Flag ID	RLA Resource	GZA Resource	Notes	Flag ID	RLA Resource	GZA Resource	Notes
A-32	BVW		Flag was found on ground and not confirmed				
A-35	BVW	Bank					
A-36	BVW	Bank					
A-37	BVW	Bank					

Flag ID	RLA Resource	GZA Resource	Notes	Flag ID	RLA Resource	GZA Resource	Notes
BNK-5	Bank	Bank		BNK-102	Bank	Bank	
BNK-6	Bank	Bank		BNK-103	Bank	BVW	Move up gradient 4'
BNK-7	Bank	Bank	Connect to BNK-9	BNK-104	Bank	Bank	
BNK-8	Bank	Remove		BNK-105	Bank	Bank	Connect to B107
BNK-9	Bank	Bank	Connect to BNK-7	BNK-106	Bank	BVW	Remove flag
BNK-10	Bank	Bank	Culvert Point	BNK-107	Bank	Bank	Fix label on plan
BNK-11	Bank	Bank		BNK-108	Bank	Bank	
BNK-12	Bank	Bank		BNK-109	Bank		Remove flag
BNK-13	Bank	BVW	Move upgradient toward A-22	BNK-110	Bank		Extend out to SW culvert (5')
BNK-14	Bank	Bank		BNK-111	Bank	Bank	Ends at headwall
BNK-15	Bank	BVW	Move upgradient toward A-23A	BNK-112	Bank	Bank	
				BNK-113	Bank	Bank	
				BNK-114	Bank	Bank	
				BNK-115	Bank	Bank	Fix connection on plan
				BNK-116	Bank	Bank	
				BNK-117	Bank	Bank	

Additional Areas Recommended for Review

GZA observed what appears to be a bordering vegetated wetland opposite the existing building on site and across Granby Road that projects buffer zone onto the site. The Commission may wish to request that this area be identified on the plan or to include language in their determination that additional jurisdictional review areas are present on the site that were not approved through this RDA process.

The Commission may wish to have the RDA Site Plan and narrative updated to reflect the changes to wetland resource area name and configuration observed by GZA.

The Commission may wish to inquire about the three wetland flags located within the forested interior of the property that were not identified on the Site Plan.



Finally, the Commission may wish to discuss the development of a culvert maintenance plan. It appears that debris and sediment periodically reduce the capacity of the culvert to convey flow. Material that appears to have been recently removed from the stream was observed to be placed on the bank adjacent to the stream.

Jurisdictional Overview

State Wetland Jurisdiction: The wetlands we have reviewed include resources that are regulated under 1) Wetlands Protection Act (WPA), M.G.L. c.131 §40 and its companion regulations, 310 CMR 10.00 and 2) 401 Water Quality Certification (WQC) regulations, 314 CMR 9.00. The Conservation Commission is the Local Approving Authority to review permit applications under the WPA regulations which includes land within 100-feet of the wetlands (a.k.a. Buffer Zone).

City of South Hadley Jurisdiction: In addition to protection under the Wetlands Protection Act, portions of the Site are also protected by the City of South Hadley Chapter 240 Wetlands Bylaw. Areas subject to protection under the Bylaw include the establishment of a fifty-foot-wide “conservation zone” and extending local jurisdictional protections to Isolated Vegetated Wetlands and Buffer Zones.

Review of Submitted Request for Determination of Applicability

GZA reviewed the RDA application to determine its completeness. R Levesque Associates, Inc. submitted a RDA to the Town of South Hadley Conservation Commission on January 31, 2025, on behalf of the Applicant and Property Owner SAI SHYAM, LLC. The RDA requests a determination of whether the area depicted is subject to the jurisdiction of the Wetlands Protection Act and the Town of South Hadley Wetlands Bylaw and whether the boundaries of resource areas are accurately delineated. This request accurately corresponds with the WPA Form 1 C.1.a, b, and d boxes checked under the Determination section. The applicant has not proposed any work under the submitted Request for Determination of Applicability.

The property at 506 Granby Road, South Hadley is described as consisting of approximately 4.15-acres which include an existing structure, parking area, and associated impervious areas. The topography at the site is relatively flat with elevations ranging from 212 to 217 feet.

In the Wetland Resource Areas section, RLA identified two on-site Bordering Vegetated Wetlands identified in the field with sequentially numbered flagging labeled “A-1 through A-37” and “B-1 through B-28”. RLA also identified off site Bank associated with an intermittent stream that was flagged in the field as “BNK-100 though BNK-103”. RLA also has identified in the narrative that a buffer zone extends into the site from the resource areas noted above.

The Commission may wish to request additional information related to the following:

- The northeast corner of the Site appears to be located within the buffer zone to and off site Bordering Vegetated Wetland on the opposite site of Granby Road. The Commission may wish to request that the portion of BVW within the public right-of-way be identified in the field and added to the Boundary Area Determination request. Alternatively, the Commission’s Determination of Applicability should note the likely presence of Buffer Zone in the Northeast corner of the property, but state that this area was not reviewed nor was the boundary approved as part of the RDA.



- Typically, GZA recommends that the Site location is added to the Flood Insurance Rate Map to clarify the parcel boundaries in relationship to potential adjacent mapped floodplain. GZA confirmed that the location shown on the FIRM panel is accurate and is not located within a FEMA 100-year floodplain.
- The Consultant did not indicate the wetland assessment and delineation method used to delineate the Bordering Vegetated Wetland boundary and Bank on the site in their project narrative. The Commission may wish to ask the Consultant to add this information to the narrative or discuss their method during a Public Hearing.

Wetland Determination Data Form Review

GZA reviewed the data forms associated with the RDA submission for their completeness and support of the wetland boundary determination. The data forms from 506 Granby Road were collected on April 29, 2025, and are associated with the wetland boundary near flag A29. Several fields were observed to be not filled out on the data forms. These include the fields listed below:

T1-up – Upland Data Plot

- County not added to the City/County field
- Latitude and Longitude were not included and therefore no datum information
- The Soil Map Unit Name was not included
- The NWI classification was not entered
- The Remarks section noted that the sample location was 30' upland of flag A29, but did not mention the drought status at the time of the data collection (D1-Moderate Drought)

GZA concurs that the data form describes a location that does not meet the criteria to be considered a wetland. The data omitted on the form would not result in a change to this finding. The Commission may wish to request an updated data form with the noted fields completed. The Commission may also consider requesting information about why the data form was collected 30 feet upgradient of the wetland line.

T1-wet – Wetland Data Plot

- County not added to the City/County field
- Latitude and Longitude were not included and therefore no datum information
- The Soil Map Unit Name was not included
- The NWI classification was not entered
- The Remarks section noted that the sample location was opposite of flag A29 in wetland, but did not mention the drought status at the time of the data collection (D1-Moderate Drought)
- The Field Observation section indicates that the data plot was taken from an area where standing water was present. The remarks section notes that the location was inundated, and sparse vegetation was limited to the wetland edge.
- On the Soil Page, the A horizon soil descriptions for 0-16" exceed 100%. It seems likely that the 10YR 2/2 was a scribing error and should be 95%.

GZA recommend that the Commission requests clarification regarding the location of the wetland data plot. Pages 1 and 2 indicate that the location is within an inundated part of the wetland, but Page 3 references a location where the wetland is not inundated. The Consultant should review whether the soil profile meets the definition of Redox Dark Surface as indicated on the form.



Peer Review Summary

The Site contains Local, State, and Federally regulated wetlands. The State regulated resources are generally flagged accurately in the field despite our opinion about the resource area types. Small adjustments to the flag locations are described in **Table 2** and on the attached annotated Site Plan. Based on our field observations, we recommend that the Commission request the Applicant to add the off-site BVW area to the north of the building. The map should be updated based on the Commission's and Applicant's discussion of the peer review comments. The Commission may wish to discuss a culvert maintenance plan at this location due to what appears to be a frequent blockage issue.

We sincerely appreciate this opportunity to be of service to the South Hadley Conservation Commission and if you should have any questions, please contact Joe Rogers at 413-218-2959.

Sincerely,
GZA GeoEnvironmental, Inc.

A handwritten signature in blue ink that reads "Joseph Rogers".

Joseph Rogers, PWS, CESSWI
Project Manager

A handwritten signature in blue ink that reads "Robin J. Casioppo".

Robin Casioppo, PWS, CWB, CESSWI
Consultant Reviewer

A handwritten signature in black ink that reads "Stephen Lecco".

Stephen Lecco, AICP, CEP, PWS
Associate Principal

Encl: Natural Resource Survey and Assessment Limitations
Annotated Conservation Filing Plan



USE OF REPORT

1. GZA GeoEnvironmental, Inc. (GZA) has prepared this report on behalf of, and for the exclusive use of Town of South Hadley Conservation Commission, ("Client") for the stated purpose(s) and location(s) identified in the report. Use of this report, in whole or in part, at other locations, or for other purposes, may lead to inappropriate conclusions; and we do not accept any responsibility for the consequences of such use(s). Further, reliance by any party not identified in the agreement, for any use, without our prior written permission, shall be at that party's risk, and without any liability to GZA.

STANDARD OF CARE

2. GZA's findings and conclusions are based on the work conducted as part of the Scope of Services set forth in the Report and/or proposal, and reflect our professional judgment. These findings and conclusions must be considered not as scientific or engineering certainties, but rather as our professional opinions concerning the data gathered and observations made during the course of our work. Conditions other than described in this report may be found at the subject location(s).
3. GZA's services were performed using the degree of skill and care ordinarily exercised by qualified professionals performing the same type of services, at the same time, under similar conditions, at the same or a similar property. No warranty, expressed or implied, is made.

LIMITS TO OBSERVATIONS

4. Natural resource characteristics are inherently variable. Biological community composition and diversity can be affected by seasonal, annual or anthropogenic influences. In addition, soil conditions are reflective of subsurface geologic materials, the composition and distribution of which vary spatially.
5. The observations described in this report were made on the dates referenced and under the conditions stated therein. Conditions observed and reported by GZA reflect the conditions that could be reasonably observed based upon the visual observations of surface conditions and/or a limited observation of subsurface conditions at the specific time of observation. Such conditions are subject to environmental and circumstantial alteration and may not reflect conditions observable at another time.
6. The conclusions and recommendations contained in this report are based upon the data obtained from a limited number of surveys performed during the course of our work on the site, as described in the Report. There may be variations between these surveys and other past or future surveys due to inherent environmental and circumstantial variability.

RELIANCE ON INFORMATION FROM OTHERS

7. Preparation of this Report may have relied upon information made available by Federal, state and local authorities; and/or work products prepared by other professionals as specified in the report. Unless specifically stated, GZA did not attempt to independently verify the accuracy or completeness of that information.

COMPLIANCE WITH REGULATIONS AND CODES

8. GZA's services were performed to render an opinion on the presence and/or condition of natural resources as described in the Report. Standards used to identify or assess these resources as well as regulatory jurisdiction, if any, are stated in the Report. Standards for identification of jurisdictional resources and regulatory control over them may vary between



governmental agencies at Federal, state and local levels and are subject to change over time which may affect the conclusions and findings of this report.

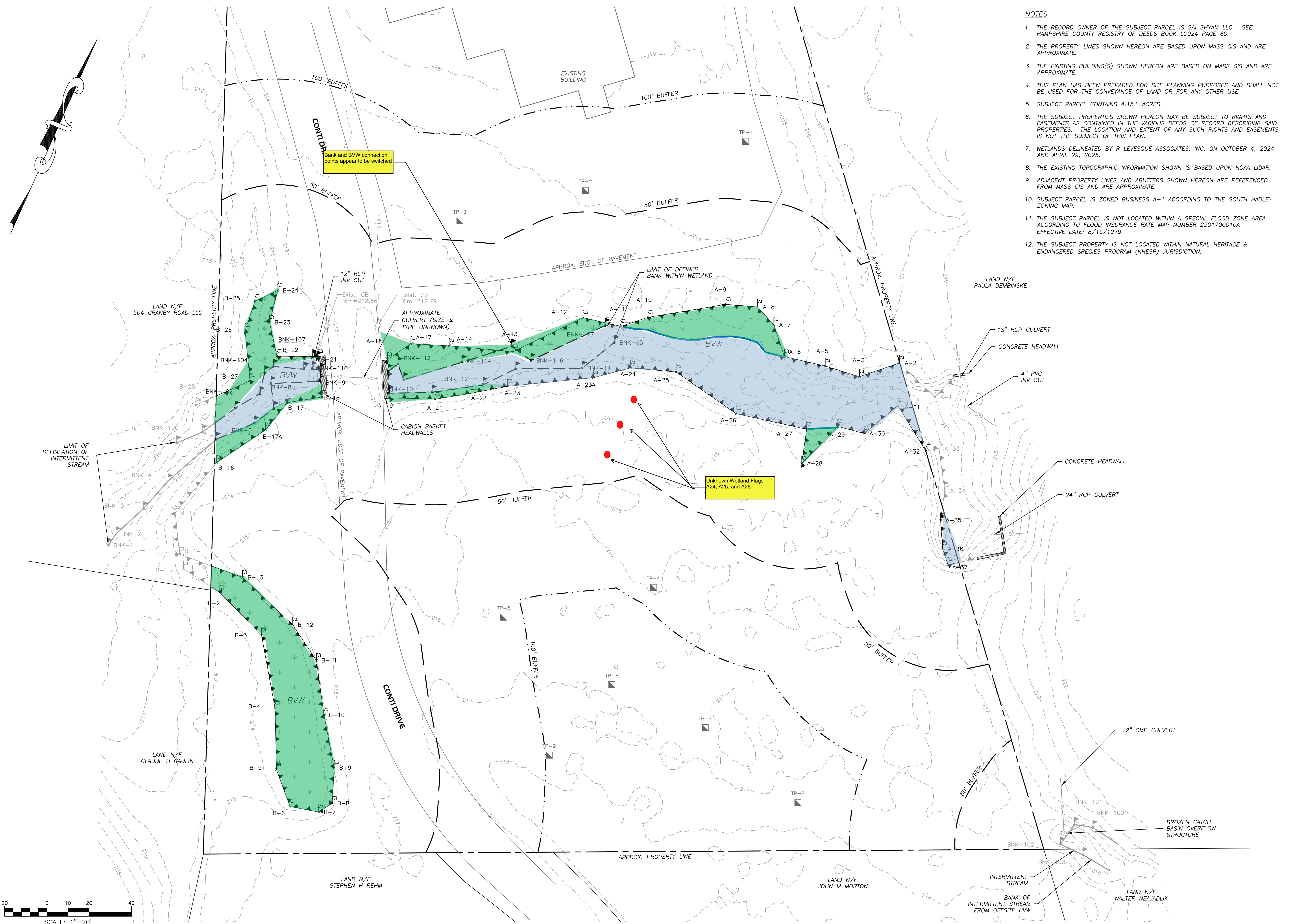
NEW INFORMATION

9. In the event that the Client or others authorized to use this report obtain information on environmental regulatory compliance issues at the site not contained in this report, such information shall be brought to GZA's attention forthwith. GZA will evaluate such information and, on the basis of this work, may modify the conclusions stated in this report.

ADDITIONAL SERVICES

10. GZA recommends that we be retained to provide further investigation, if necessary, which would allow GZA to (1) observe compliance with the concepts and recommendations contained herein; (2) evaluate whether the manner of implementation creates a potential new finding; and (3) evaluate whether the manner of implementation affects or changes the conditions on which our opinions were made.

S:\Projects\2024\240926 - Parcel - 506 Granby Road, South Hadley\05 Civil 3D\240926 - SITE.dwg



- NOTES**
1. THE RECORD OWNER OF THE SUBJECT PARCEL IS SAI SHYAM LLC. SEE HAMPSHIRE COUNTY REGISTRY OF DEEDS BOOK LC024 PAGE 60.
 2. THE PROPERTY LINES SHOWN HEREON ARE BASED UPON MASS GIS AND ARE APPROXIMATE.
 3. THE EXISTING BUILDING(S) SHOWN HEREON ARE BASED ON MASS GIS AND ARE APPROXIMATE.
 4. THIS PLAN HAS BEEN PREPARED FOR SITE PLANNING PURPOSES AND SHALL NOT BE USED FOR THE CONVEYANCE OF LAND OR FOR ANY OTHER USE.
 5. SUBJECT PARCEL CONTAINS 4.15± ACRES.
 6. THE SUBJECT PROPERTIES SHOWN HEREON MAY BE SUBJECT TO RIGHTS AND EASEMENTS AS CONTAINED IN THE VARIOUS DEEDS OF RECORD DESCRIBING SAID PROPERTIES. THE LOCATION AND EXTENT OF ANY SUCH RIGHTS AND EASEMENTS IS NOT THE SUBJECT OF THIS PLAN.
 7. WETLANDS DELINEATED BY R LEVESQUE ASSOCIATES, INC. ON OCTOBER 4, 2024 AND APRIL 29, 2025.
 8. THE EXISTING TOPOGRAPHIC INFORMATION SHOWN IS BASED UPON NOAA LIDAR.
 9. ADJACENT PROPERTY LINES AND ABUTTERS SHOWN HEREON ARE REFERENCED FROM MASS GIS AND ARE APPROXIMATE.
 10. SUBJECT PARCEL IS ZONED BUSINESS A-1 ACCORDING TO THE SOUTH HADLEY ZONING MAP.
 11. THE SUBJECT PARCEL IS NOT LOCATED WITHIN A SPECIAL FLOOD ZONE AREA ACCORDING TO FLOOD INSURANCE RATE MAP NUMBER 2501700010A - EFFECTIVE DATE: 8/15/1979.
 12. THE SUBJECT PROPERTY IS NOT LOCATED WITHIN NATURAL HERITAGE & ENDANGERED SPECIES PROGRAM (NHESP) JURISDICTION.

RLA
R LEVESQUE ASSOCIATES INC.
 Landscape Architects
 Civil Engineers - Land Surveyors
 Environmental Consultants
 ph: 413.568.0985 fax: 413.568.0986
 40 School Street
 Westfield, MA 01085
 rland.com

CONSERVATION FILING PLAN

**506 Granby Road
 South Hadley, MA
 Map 32 Parcel 52**

PREPARED FOR:
 Sai Shyam, LLC
 c/o Himanshu Patel
 506 Granby Road
 South Hadley, MA 01075
 ISSUANCE DATE: May 2, 2025
 REVISIONS: DATE:

 DRAFTED BY: M.B.
 UNAUTHORIZED ALTERATION OF THIS DOCUMENT IS A VIOLATION OF MASSACHUSETTS STATE LAW
 SCALE: As Noted
 RLA PROJ. NUMBER: 240926
 DRAWING# REV.
W-1 -