

May 21, 2026

Mr. Josh Meyerhofer, PE
Senior Project Engineer
MSA Professional Services, Inc.
220 E. Buffalo Street
Milwaukee, WI 53202

RE: INNIO Plant Expansion (SPAR26-00023)
Project No.: SPAR26-00023
Details: 2nd Review May 20th, 2026
raSmith Project No.: 3250244

Dear Mr. Meyerhofer,

Below are raSmith's responses to MSA's review letter dated May 20th 2026, regarding the above-referenced matter:

General

1. Issuance of *All Engineering Requirements Met Concurrence Letter* is required prior to application for & issuance of Building Permit. Items required for issuance of Concurrence Letter include:
 - a. Final site plans with all engineering comments addressed
 - b. Recorded CSM
 - c. WisDNR WRAPP Permit/NOI, and NOI for fill site, if disturbance over 1 acre
 - d. Financial Guarantees
 - e. Payment of Impact Fees
 - f. Recorded Stormwater Maintenance Agreement

raSmith Response No. 1. - General: Noted. This comment has been forwarded to the owner and construction team.

2. Depending on the final design, the below listed permits or approvals may be needed. Please submit digital copies of permits to City for filing prior to starting construction and obtaining a building permit.
 - a. City of Waukesha Storm Water Erosion Control Permit if disturbance over 3,000 sf
 - b. City of Waukesha – Engineering Division Construction Permit for all RW work.
 - c. Applicable sewer connection charges per Chapter 29.11(c) will be owed to the City for this project. Coordinate with Waukesha Water Utilities.

raSmith Response No. 2. - General: a) City of Waukesha Storm Water Erosion Control Permit will be applied for. b) City of Waukesha right of way permit will be applied for by contractor. c) raSmith will coordinate with Waukesha Water Utilities for sewer connection fee.

3. The construction drawings, and financial guarantees should be reviewed and approved prior to the construction being started and building permit issued. If the location of any work needs to be changed as a result of the approved construction drawings, the drawings should be updated to reflect the needed changes.

raSmith Response No. 3. - General: Acknowledged.



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4. The existing parcel has a sanitary sewer lateral connecting the City's sewer main. Please provide a pre and post construction sewer lateral video to City for review and approval. Contact the City Engineering Department for the video format. If lateral maintenance is needed, then the lateral improvements may need to be included as part of this project. The lateral pipe and connection to the main may need to be lined or relayed to reduce infiltration into the City's sanitary sewer system or improve the structural integrity. Provided, City to approve.

raSmith Response No. 4. - General: A sewer lateral video will be submitted to City for review and approval.

5. See all other comments, including TrackIT summary & stormwater requirements.

raSmith Response No. 5. - General: Acknowledged.

6. Finalized sanitary sewer vacate.

raSmith Response No. 6. - General: A copy of the easement vacation exhibit has been included as part of this submittal. Our understanding is that the City will prepare the written document that this exhibit will be part of. Please provide for signature at your convenience.

7. Provide access details and recordable document associated with SW easement.

raSmith Response No. 7. - General: The Stormwater Access Easement is shown on C500 with a detailed line table. We have added this table to the maintenance agreement that will be recorded as we have done on past City of Waukesha projects.

8. The access easement from N Prairie Ave shall be dedicated for use to access both Sanitary and Stormwater.

raSmith Response No. 8. - General: Acknowledged.

ALTA Survey

9. Survey indicates encroachments. These should be remedied as part of this project. This may be addressed in separate documents as SPAR progresses; however City shall retain Financial Guarantee until encroachments have been addressed. As part of the separate documents, please provide 1' sidewalk maintenance easement adjacent to the ROW.

raSmith Response No. 9. – ALTA Survey: Per our previous discussion we are requesting that the encroachments be dealt with independent of Project Green to avoid any delay in this project. If there are terms to allow us to proceed in this direction, we are open to discussion.

C200

10. Final plans shall include start and end dates.

raSmith Response No. 10. – C200: End dates included in Construction Sequence on sheets C200 and C201.

C503

11. Updated plans include sanitary lateral from building addition north to existing private sanitary lateral. Design appears acceptable.

raSmith Response No. 11. – C503: Acknowledged.

12. Private storm from STO INL 710 to STO INL 705A crosses existing sanitary main not shown on crossing table. Inverts appear to indicate no conflict.

raSmith Response No. 12. – C503: Crossings with existing sanitary added to sheets.



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SWMP

13. **Classification:** MSA concurs that the project would qualify as a redevelopment project in the context of Waukesha's post-construction stormwater management ordinance.

raSmith Response No. 13. – SWMP: Acknowledged.

14. **Peak Discharge Rate Control:** The narrative included in the stormwater management plan regarding peak discharge rate control is confusing and appears to incorrectly tabulate existing and proposed runoff conditions. Additionally modeling completed for existing and proposed conditions do not include equal areas. Regardless, review and reconstruction of submitted modeling indicates that **the stormwater management plan satisfies peak discharge rate control requirements.**

- a. 05/04 Submittal – subwatershed boundaries are different than the previous submittal. Total area assessed in the current submittal is slightly larger than the previous submittal. There are also still discrepancies between total area modeled under existing and proposed conditions. Regardless, as before, reconstruction of submitted modeling indicates that the stormwater management plan satisfies peak discharge rate control requirements

raSmith Response No. 14. – SWMP: As discussed on our call, there are two “Offsite” areas that are tributary to the west underground detention basin. This water only flows through the system. The tank has been sized to handle the flow, but is not treated at the same rate as the onsite flows.

15. **Water Quality Treatment:** WinSLAMM modeling shows the site to achieve 52% TSS reduction (MSA assessment indicates slightly higher) which exceeds the 40% TSS reduction requirement for redevelopment projects. **The stormwater management plan satisfies stormwater quality treatment requirements.**

- a. 05/04 Submittal - The stormwater management plan satisfies stormwater quality treatment requirements (estimated TSS reduction = 51.1%)

raSmith Response No. 15. – SWMP: Acknowledged.

16. **Infiltration:** The stormwater management plan indicates that no geotechnical investigations were completed, but that it is anticipated that the site is exempt from infiltration requirements. It is observed; however, that model input data indicates that proposed impervious area will be less than existing (a net increase in pervious area of 3929 sf). As a result, infiltration after site redevelopment should be greater than existing. **The stormwater management plan satisfies infiltration requirements.**

- a. *05/04 Submittal - The current submittal shows a net increase in impervious area relative to existing conditions. As a result, MSA's prior conclusion that infiltration would be achieved passively no longer applies.*
- b. *05/04 Submittal - The geotechnical report concludes that, based on soil textures, that native soil textures can support infiltration; but concludes that the site would be exempt from infiltration based on the invert of the stormwater structure being at*
- c. *797.25 vs seasonal high groundwater being at 796.0 feet. It is observed; however, that the actual inverts of the underground devices are 802.25 (west) and 800.85 (east), which provides more than the ordinance minimum separation distance of 3 feet.*
- d. *05/04 Submittal - The stormwater management plan narrative indicates there are contaminated soils on site. This is supported by the geotechnical report which indicates 'strong [petroleum SW-1] odor' for several borings (SB-1, 2, 3, 4, 6, 7, 9, 10, 11, SW-1) spanning the majority of the redevelopment site.*
- e. *05/04 Submittal - Accepting that a petroleum smell is an indicator of groundwater contamination by a 'contaminant of concern' then this site is prohibited from infiltrating stormwater.*

raSmith Response No. 16. – SWMP: Acknowledged.



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17. Storm Sewer Design: Review of calculations suggests that the storm sewer system have been properly designed to collect and convey 100-yr runoff rates to proposed stormwater management features; however, documentation of the design is unclear. **The following additional information should be provided:**
raSmith Response No. 17. – SWMP: Was provided in last submittal.

18. A map indicating drainage areas for each element of the storm sewer system.
a. 05/04 Submittal - map has been provided.

raSmith Response No. 18. – SWMP: Acknowledged.

19. A schematic diagram indicating which storm pipe element in the design calculations corresponds to each pipe on the design plans.
a. 05/04 Submittal – A diagram has been provided

raSmith Response No. 19. – SWMP: Acknowledged.

20. Additional detail should be provided showing how the storm serving the off-site watersheds are connected to the proposed underground stormwater management devices.
a. 05/04 Submittal – A map and narrative description has been provided.

raSmith Response No. 20. – SWMP: Acknowledged.

21. Inlet capacity calculations showing that 100-yr flows can be captured by inlets without bypassing overland away from the storm sewer system and stormwater management BMPs. Confirmation that roof drain systems convey 100-yr peak flows to connection points shown on civil construction plans. MSA's experience is that often roofs have multiple redundant roof drain systems which come online during different events and which do not always discharge to the same location.
a. 05/04 Submittal – both items have been provided (inlet capacity and roof drain assessment).
b. 05/04 Submittal – As presented the storm sewer system appears to have adequate inlet and pipe capacity to convey 100-yr peak stormwater to the underground devices as described in (required by) the stormwater management plan.

raSmith Response No. 21. – SWMP: Acknowledged.

22. Long Term Maintenance Plan: Additional detail should be added to the LTMA:

raSmith Response No. 22. – SWMP: Acknowledged.

23. Information describing how sediment accumulation in the underground devices is to be measured.
a. 05/04 Submittal – Required text not found.

raSmith Response No. 23. – SWMP: Additional text has been added to the Maintenance Agreement.

24. It should be indicated that sediment accumulations resulting in permanent pool depths less than 3.0 feet indicates a need for sediment removal.

a. 05/04 Submittal – required text has been added

raSmith Response No. 24. – SWMP: Acknowledged.

25. General requirements for the disposal of water and sediment from the system should be included (i.e. water must not be discharged to a water of the state and sediment must be tested for contaminants prior to land spreading, or sent to a landfill).

a. 05/04 Submittal – required text regarding sediment has been added, although it should be clarified by removing the reference to 'washing back into the basin' as it is unlikely that sediment will be disposed of in the area draining to the underground devices. Language still need to be added



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describing how to handle decant water – specifically not to be discharged to a storm sewer or water of the state/US.

raSmith Response No. 25. – SWMP: Additional text has been added to the Maintenance Agreement.

26. The referenced 'attached Inspection Form for Storm Water Management Systems' should be included.

a. 05/04 Submittal – reference attached form removed.

raSmith Response No. 26. – SWMP: The City Inspection Form has been include in the Maintenance Agreement.

If you should have any additional questions, please email me at jeff.yersin@rasmith.com, or call me at 262-317-3232.

Sincerely,
raSmith

Jeff Yersin, P.E.
Senior Project Engineer