

SHEET INDEX	
SHEET NO.	DESCRIPTION
1	TITLE SHEET
2	ENVIRONMENTAL CONCEPT PLAN

STORMWATER MANAGEMENT SUMMARY			
AREA ID.	ESDV REQUIRED CU.FT.	ESDV PROVIDED CU.FT.	REMARKS
SITE	1,443	650	DRY WELLS (M-5), GRASS SWALE (M-8), AND ROOFTOP DISCONNECTIONS (N-1)
TOTAL	1,443	650	

NOTE: SITE CONTAINS AN EXISTING HOUSE WHICH WAS BUILT UNDER SOP-12-06B. SINCE SOME OF THE STORMWATER MANAGEMENT HAS BEEN REVISED UNDER THIS PLAN, THE REVISED PORTIONS HAVE BEEN INCLUDED WITHIN THIS REPORT. THIS REPORT DOES NOT INCLUDE PREVIOUS ROOFTOP AND NON-ROOFTOP DISCONNECTIONS THAT ARE REMAINING ON-SITE. ALL IMPERVIOUS SURFACES HAVE BEEN TREATED, THEREFORE NO ADDITIONAL TREATMENT IS REQUIRED.

GROSS AREA = 1.07 ACRES  
 LOD = 0.49 ACRES  
 RCN = 55  
 TARGET Pe = 1.8'

# ENVIRONMENTAL CONCEPT PLAN

## CRISWOOD MANOR, SECTION 4, LOTS 21 & 22

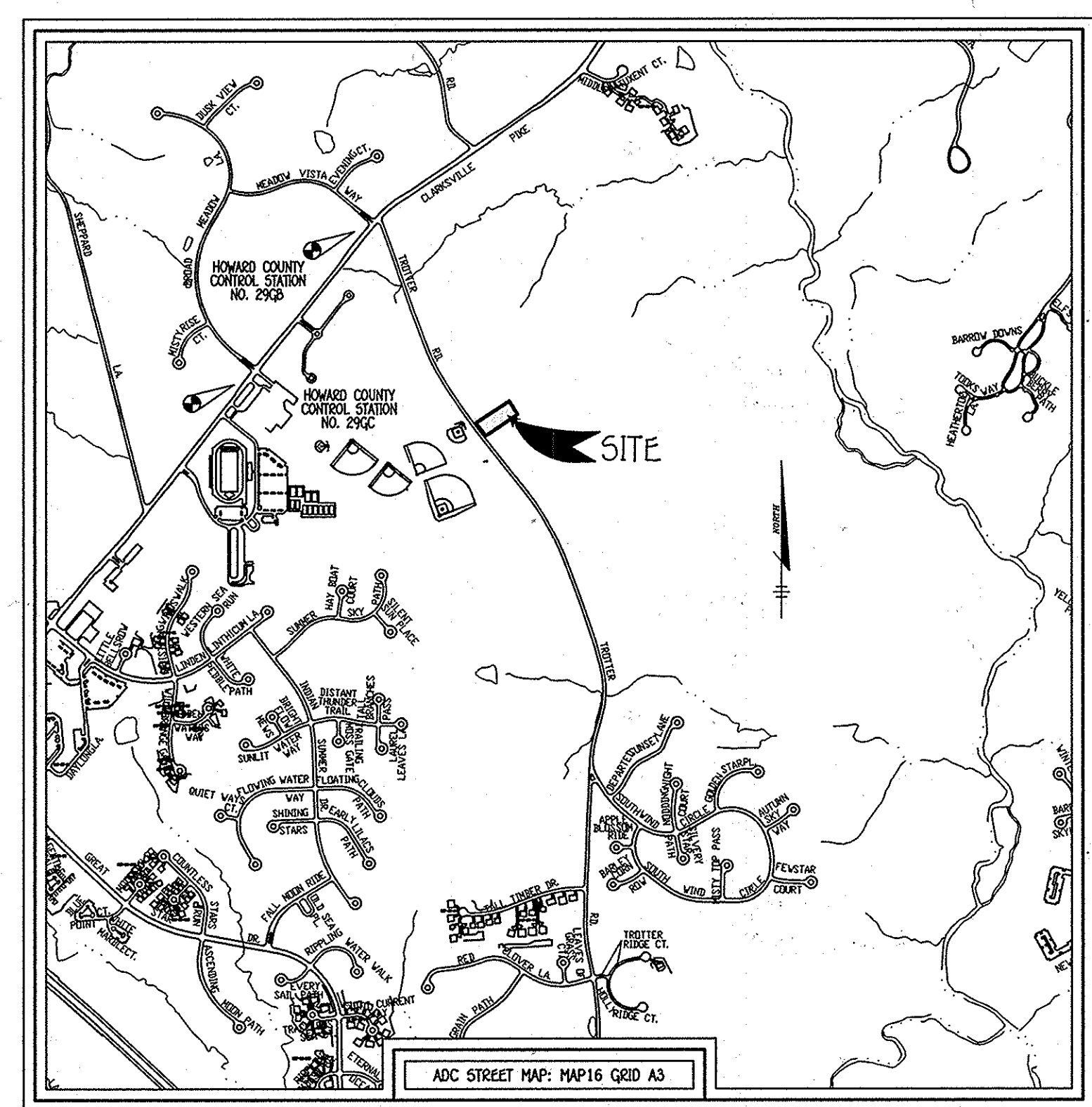
TAX MAP No. 29 GRID No. 20 PARCEL Nos. 88  
 FIFTH ELECTION DISTRICT HOWARD COUNTY, MARYLAND

LEGEND			
SYMBOL	DESCRIPTION	SYMBOL	DESCRIPTION
	EXISTING 2' CONTOURS		PROPOSED CONTOUR
	EXISTING 10' CONTOURS		SPOT ELEVATION
	SOILS LINES AND TYPE		LIMITS OF DISTURBANCE
	EXISTING TREELINE		PROPOSED TREELINE
	15% TO 24.9% STEEP SLOPES		EXISTING & PROPOSED PAVING
	25% AND GREATER STEEP SLOPES		BORING (PERC) TEST HOLE
	100 YEAR PUBLIC FLOODPLAIN, DRAINAGE AND UTILITY EASEMENT		SILT FENCE
	WETLAND AREA		EROSION CONTROL MATTING
	25' WETLAND BUFFER		SUPER SILT FENCE
	STREAM BANK BUFFER		STABILIZES CONSTRUCTION ENTRANCE
	100 YEAR FLOODPLAIN LINE		DRAINAGE AREA DIVIDE
	SPECIMEN TREE		TREE PROTECTION

### DESIGN NARRATIVE

**Introduction:**  
 This report will demonstrate how the criteria set forth in the Maryland Stormwater Design Manual, Volumes I and II (effective October 2000, revised May 2009) will be satisfied on this project. The goal of creating hydrology similar to that of 'woods in Good Condition' will be accomplished through the use of the practices contained within Chapter 5 of said manual. The achievement of this goal will remove the requirement of providing Channel Projection Volume.

- General Site Conditions:**  
 Criswood Manor, Section 4, resubdivision of Lot 4 is a single family lot subdivision of two lots. Property is zoned R-20 and located on Tax Map 29, Grid No. 20, Parcel No. 88, Lot No. 4 of the Howard County, Maryland Tax Map Database System. The property is a part of a 19 subdivision located along the northeast side of Trotter Road approximately 2,000 feet southeast of the intersection of Trotter Road with Maryland Route 100. Subdivision will utilize a public water and sewer. The property is located in the Clarksville area of Howard County draining to an unnamed tributary of Middle Patuxent River watershed (02131106). This property is rectangular in shape and runoff on-site is mainly from southwest to northeast to an off-site stream. Site is not forested and contains no wetlands, wetland buffers, stream, stream buffers, steep slopes, or 100 year floodplain. Per a field inspection conducted by Kleinfelder Environmental, LLC dated October 24, 2011, no wetlands and stream are present on-site. The Web Soil Survey shows soils on the site consist of only Gleyside loam (GgB), Type "B" soils. The existing house was built under SOP-12-06B and utilized rooftop and non-rooftop disconnection and a micro-bioretenion facility. The micro-bioretenion facility is to be removed and rooftop drainage directed into proposed dry wells. So, the runoff from the roof of the existing and proposed houses is to be directed overland or through roof leaders to two (2) drywells to be located on each lot and Lot 22 will utilize rooftop disconnections for a portion of the rear of the proposed house. The proposed driveway for Lot 22 will be treated by a flat bottom grass channel. The expanded driveway on Lot 21 will continue to utilize the non-rooftop disconnection previously provided.
- Natural Resource Protection:**  
 Environmentally sensitive areas do not exist on-site (steep slopes, wetlands, wetland buffer, floodplain, stream, and stream buffer), therefore no effort to protect natural resources on-site is required.
  - Maintenance of Natural Flow Patterns:**  
 It is the intent of the proposed design to discharge runoff similar to the characteristics and direction of this site prior to any of the proposed improvements.
  - Reduction of Impervious Areas through better site design, alternative surfaces and Nonstructural Practices:**  
 The design of this project utilizes a common driveway and individual driveways for the two lots. Non-structural practices as permitted in Chapter 5, four (4) Dry Wells (M-5), a Grass Swale (M-8), and Rooftop Disconnection (N-1) will be used to address ESD to the MEP requirements.
  - Integration of Erosion and Sediment Control into Stormwater Strategy:**  
 The majority of the site runoff sheet flows from southwest to northeast. Silt fence, super silt fence, and erosion control matting will be utilized for erosion and sediment control. There is no direct discharge of runoff directly to a stream or wetlands. All site runoff will discharge to the existing ground and eventually to the Middle Patuxent River. No drainage easements will be required. It is anticipated that all cut will be utilized on-site for construction at time of Grading Plan.
  - Implementation of ESD Planning Techniques and practices to the Maximum Extent Practicable (MEP):**  
 The full required ESD volume is being provided.
  - Request for 3 Design Manual Waivers:**  
 No Waivers related to stormwater management are being requested in this project.



**BENCHMARK INFORMATION**

B.M.# 29GB - HOWARD COUNTY CONTROL STATION #13CA - HORIZONTAL - (NAD '83)  
 N 566,826.1708  
 E 1,333,265.0943  
 ELEVATION = 495.965 - VERTICAL - (NAVD '86)

B.M.# 29GC - HOWARD COUNTY CONTROL STATION #071A - HORIZONTAL - (NAD '83)  
 N 565,530.8138  
 E 1,332,249.7022  
 ELEVATION = 490.718 - VERTICAL - (NAVD '86)

Table B.4. Materials Specifications for Micro-Bioretenion, Rain Gardens & Landscape Infiltration

Material	Specification	Size	Notes
Plantings	see Appendix A, Table A.4	n/a	plantings are site-specific
Planting soil (2" to 4" deep)	loamy sand 50-55% compost 35-40% or sandy loam 30% coarse sand 30% compost 40%		USDA soil types loamy sand or sandy loam; clay content <5%
Organic Content	Min. 10% by dry weight (ASTM D 8724)		
Mulch	shredded hardwood		aged 6 months, minimum
Pea gravel diaphragm	pea gravel: ASTM-D-448	No. 8 or No. 9 (1/8" to 3/8")	
Curbin drain	ornamental stone: washed cobble	stone: 2" to 5"	
Geotextile	n/a		FE Type 1 nonwoven
Gravel (underdrains and infiltration berms)	ASHTO M-43	No. 57 or No. Aggregate (3/8" to 3/4")	
Underdrain piping	F 750, Type PS 28 or ASHTO M-259	4" to 6" rigid schedule 40 PVC or 3000PS	Slotted or perforated pipe; 3/8" perft. @ 12" on center, 4 holes per row; minimum of 2" of gravel over pipe; not necessary underneath pipes. Perforated pipe shall be wrapped with 1/4 inch galvanized hardware cloth
Poured in place concrete (if required)	MSHA Mix No. 3; f = 3500 psi at 28 days, normal weight, air-entrained, reinforcing to meet ASTM-615-60	n/a	on-site testing of poured-in-place concrete required: 28 day strength and slump test; all concrete design (cast-in-place or pre-cast) not using precast approved sites or local standards requires design drawings sealed and approved by a professional structural engineer licensed in the State of Maryland - design to include meeting ACI Code 508.8/9; vertical loading BS-10 or BS-20; slabs with horizontal loading (based on soil pressures); and analysis of potential cracking
Sand	ASHTO-M-6 or ASTM-C-33	0.02" to 0.04"	Sand substitutions such as Dibble and Gypstone (ASHTO) #10 are not acceptable. No calcium carbide or dolomitic sand substitutes are acceptable. No "rock dust" can be used for sand.

### SOILS LEGEND

SOIL	NAME	CLASS	K FACTOR
GgB	Gleyside loam, 3 to 8 percent slopes	B	0.20

### GENERAL NOTES

- THE CONTRACTOR SHALL NOTIFY THE DEPARTMENT OF PUBLIC WORKS/BUREAU OF ENGINEERING/CONSTRUCTION INSPECTION DIVISION AT 410-313-1800 AT LEAST FIVE (5) WORKING DAYS PRIOR TO THE START OF WORK.
- THE CONTRACTOR SHALL NOTIFY (P&S UTILITY) AT 1-800-297-7777 AT LEAST 48 HOURS PRIOR TO ANY EXCAVATION WORK BEING DONE.
- BOUNDARY SHOWN HEREON IS BASED ON FIELD RUN MONUMENTED BOUNDARY SURVEY PERFORMED BY RAZTEC ASSOCIATES, INC., DATED MAY, 2011. TOPOGRAPHY SHOWN HEREON IS BASED ON A TOPOGRAPHIC SURVEY PERFORMED BY RAZTEC ASSOCIATES, INC., DATED MAY, 2011, AND SUPPLEMENTED WITH HOWARD COUNTY GIS TOPOGRAPHY AT 5' CONTOUR INTERVAL INTERPOLATED FOR 2' CONTOUR INTERVAL.
- THE COORDINATES SHOWN HEREON ARE BASED UPON THE HOWARD COUNTY GEODETIC CONTROL WHICH IS BASED UPON THE NATIONAL STATE PLANE COORDINATE SYSTEM. HOWARD COUNTY MONUMENT NOS. 29GB AND 29GC WERE USED FOR THIS PROJECT.
- PREVIOUS DFP FILE NUMBERS: ECP-12-017; SOP-12-06B.
- STORM WATER MANAGEMENT IS IN ACCORDANCE WITH THE M.D.E. STORM WATER DESIGN MANUAL, VOLUMES I & II, REVISED 2009. NON-STRUCTURAL PRACTICES IN ACCORDANCE WITH CHAPTER 5 ARE BEING UTILIZED.
- THIS PROPERTY IS LOCATED INSIDE THE METROPOLITAN DISTRICT. LOTS TO BE SERVED PUBLIC WATER AND PUBLIC SEWER. CONNECTIONS TO CONTRACT #34-4805-D WILL BE PROVIDED BY ADO PRIOR TO BUILDING PERMIT.
- ANY DAMAGE TO THE COUNTY'S RIGHT-OF-WAY SHALL BE CORRECTED AT THE DEVELOPER'S EXPENSE.
- THE SUBJECT PROPERTY IS ZONED R-20 (PER DATE 10/06/2013 COMPREHENSIVE ZONING PLAN).
- NO CEMETERIES OR HISTORIC STRUCTURES EXIST ON-SITE.
- NO STEEP SLOPES, 100 YEAR FLOODPLAIN, STREAM(S), STREAM BUFFERS, WETLAND(S), WETLAND BUFFER(S), AND FOREST STAND DELINEATION EXIST ON-SITE.
- LANDSCAPING WILL BE PROVIDED AT THE FINAL PLAN STAGE OF THIS PROJECT. TREES SHOWN ARE EXISTING.
- FOREST CONSERVATION REQUIREMENT WILL BE ADDRESSED AT FINAL PLAN STAGE. IT IS ASSUMED A FEE-IN-LIEU WILL BE PAID.
- ONE SOIL BORING WILL BE REQUIRED FOR THIS PROJECT. PERCOLATION TESTS WERE CONDUCTED IN CLOSE PROXIMITY TO TWO OF THE PROPOSED DRY WELLS LOCATIONS. A SOIL BORING WILL BE EXCAVATED IN PROXIMITY TO THE PROPERTY LINE BETWEEN PROPOSED LOTS 21 AND 22 FOR THREE PROPOSED DRY WELLS.
- APPROVAL OF THIS ECP DOES NOT CONSTITUTE AN APPROVAL OF ANY SUBSEQUENT AND ASSOCIATED SUBMISSION PLAN/PLAT AND/OR SITE DEVELOPMENT PLAN AND/OR RED-LINE REVISION PLAN. REVIEW OF THIS PROJECT FOR COMPLIANCE WITH THE HOWARD COUNTY SUBDIVISION AND LAND DEVELOPMENT REGULATIONS AND THE HOWARD COUNTY ZONING REGULATIONS SHALL OCCUR AT THE SUBMISSION PLAN/PLAT AND/OR SITE DEVELOPMENT PLAN STAGES AND/OR RED-LINE REVISION PROCESS. THE APPLICANT AND CONSULTANT SHOULD EXPECT ADDITIONAL AND MORE DETAILED REVIEW COMMENTS (INCLUDING COMMENTS THAT MAY ALTER THE OVERALL SITE DESIGN) AS THIS PROJECT PROGRESSES THROUGH THE PLAN REVIEW PROCESS.

### SITE ANALYSIS DATA CHART

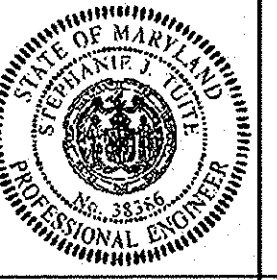
- TOTAL AREA OF THIS SUBMISSION = 1.07 AC.\*
- LIMIT OF DISTURBED AREA = 0.49 AC.\*
- PRESENT ZONING DESIGNATION = R-20 (PER 10/06/2013 COMPREHENSIVE ZONING PLAN)
- PROPOSED USE: RESIDENTIAL
- PREVIOUS HOWARD COUNTY FILES: N/A
- TOTAL AREA OF FLOODPLAIN LOCATED ON SITE = 0.00 AC
- TOTAL AREA OF SLOPES IN EXCESS OF 15% = 0.00 AC
- TOTAL AREA OF WETLANDS (INCLUDING BUFFER, LOCATED OUTSIDE OF THE FLOODPLAIN) = 0.00 AC
- TOTAL AREA OF STREAM (INCLUDING BUFFER, LOCATED OUTSIDE OF THE FLOODPLAIN) = 0.00 AC
- TOTAL AREA OF EXISTING FOREST = 0.00 AC (EXCLUDES FLOODPLAIN)
- TOTAL AREA OF FOREST TO BE RETAINED = 0.00 AC
- TOTAL GREEN OPEN AREA = 0.85 AC\*
- TOTAL IMPERVIOUS AREA = 0.22 AC\*
- TOTAL AREA OF ERODIBLE SOILS = 0.00 AC.\*

### OPERATION & MAINTENANCE SCHEDULE FOR PRIVATELY OWNED AND MAINTAINED OPEN CHANNEL SYSTEMS - GRASS SWALES, (M-8)

- THE OPEN CHANNEL SYSTEM SHALL BE INSPECTED ANNUALLY AND AFTER MAJOR STORMS. INSPECTIONS SHALL BE PERFORMED DURING WET WEATHER TO DETERMINE IF THE FACILITY IS FUNCTIONING PROPERLY.
- THE OPEN CHANNEL SHALL BE MOWED A MINIMUM OF AS NEEDED DURING THE GROWING SEASON TO MAINTAIN A MAXIMUM GRASS HEIGHT OF LESS THAN 6 INCHES.
- DESIGNS AND LITTER SHALL BE REMOVED DURING REGULAR MOWING OPERATIONS AND AS NEEDED.
- VISIBLE SIGNS OF EROSION IN THE OPEN CHANNEL SYSTEM SHALL BE REPAIRED AS SOON AS IT IS NOTICED.
- REMOVE SILT IN THE OPEN CHANNEL SYSTEM WHEN IT EXCEEDS 25% OF THE ORIGINAL WAY.
- INSPECT CHECK DAMS TWICE A YEAR FOR STRUCTURAL INTEGRITY. RESTORE CHECK DAMS TO ORIGINAL CONDITION AS APPLICABLE.

**FISHER, COLLINS & CARTER, INC.**  
 CIVIL ENGINEERING CONSULTANTS & LAND SURVEYORS  
 CENTENNIAL SQUARE OFFICE PARK - 10722 BALTIMORE NATIONAL PIKE  
 ELLSWORTH CITY, MARYLAND 21042  
 (410) 461-2295

**PROFESSIONAL CERTIFICATION**  
 I HEREBY CERTIFY THAT THESE DOCUMENTS WERE PREPARED OR APPROVED BY ME AND THAT I AM A DULY LICENSED PROFESSIONAL ENGINEER UNDER THE LAWS OF THE STATE OF MARYLAND, LICENSE NO. 38386, EXPIRATION DATE: 01/12/2016.  
 Signature of Professional Engineer: *Supraman Sivith* 6/30/14  
 DATE



**OWNER/DEVELOPER**  
 THOMAS V. SAMUEL & SISSY M. AMBLY  
 5517 TROTTER ROAD  
 CLARKSVILLE, MARYLAND 21029  
 301-552-0005

APPROVED: HOWARD COUNTY DEPARTMENT OF PLANNING AND ZONING

*K. T. Ralston* 7-07-14  
 Chief, Division of Land Development Date

*W. J. Ralston* 7-29-14  
 Chief, Development Engineering Division Date

PROJECT	SECTION	LOT NO.
CRISWOOD MANOR	4	4

DEED	BLOCK NO.	ZONE	TAX/ZONE	ELEC. DIST.	CENSUS TR.
12539/403	0020	R-20	0029	FIFTH	6068.02

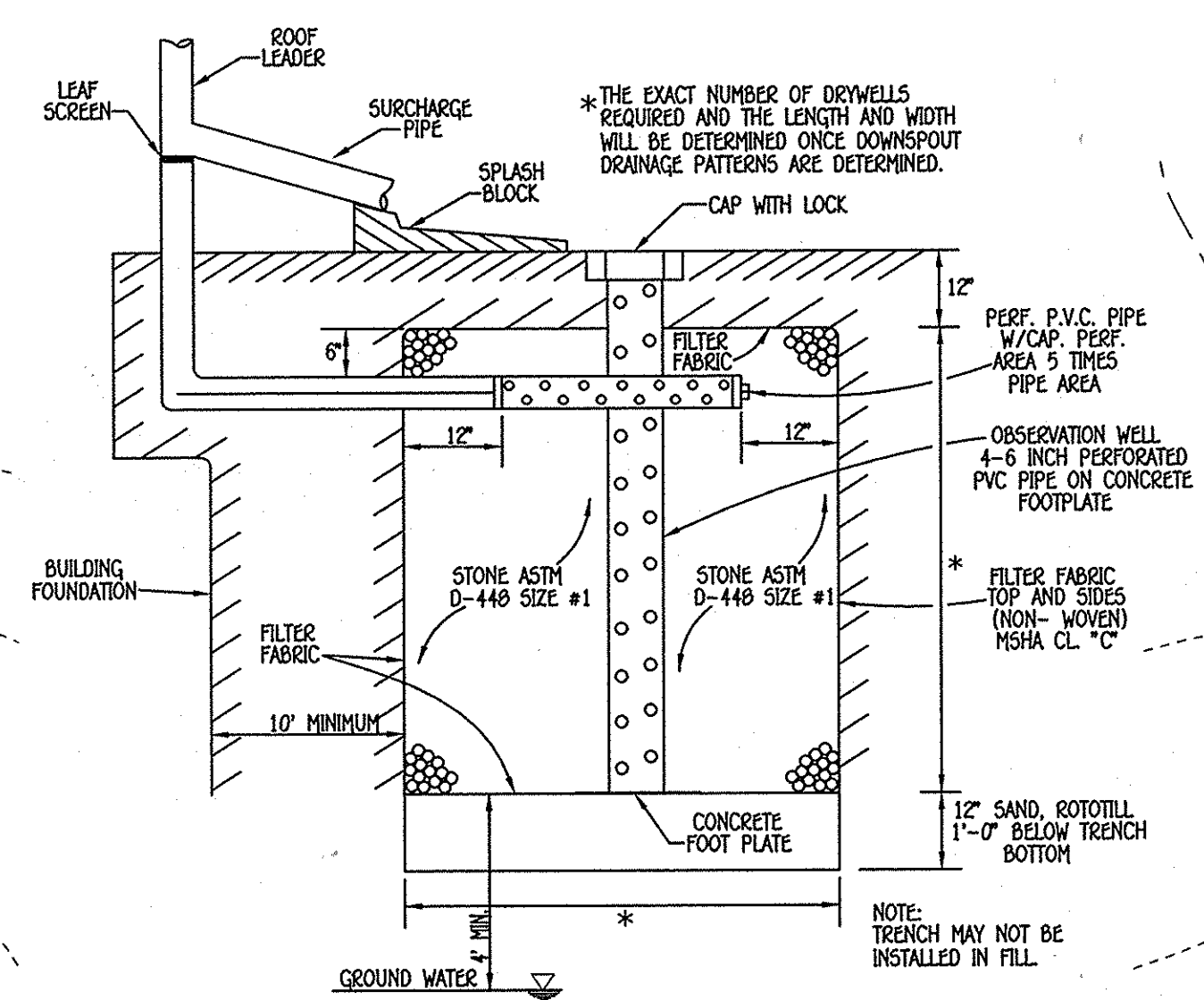
TITLE SHEET  
**CRISWOOD MANOR**  
 SECTION 4, LOTS 21 & 22  
 ZONED R-20  
 TAX MAP No. 29 GRID No. 20 PARCEL No. 88  
 FIFTH ELECTION DISTRICT HOWARD COUNTY, MARYLAND  
 SCALE: AS SHOWN DATE: JUNE, 2014  
 SHEET 1 OF 2  
 ECP-14-080



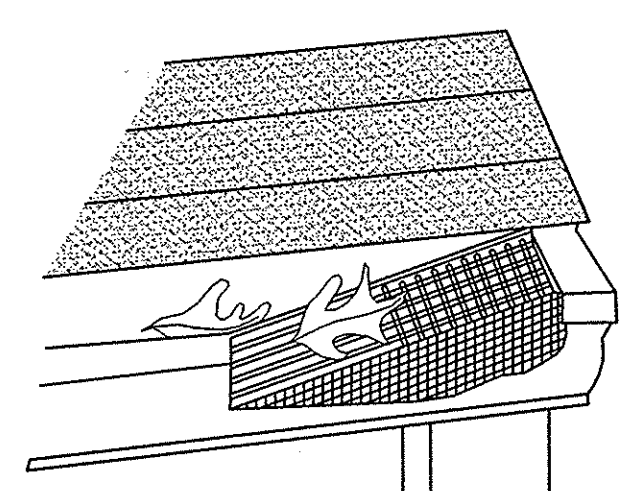
HOWARD COUNTY, MARYLAND  
TAX MAP 35, PARCEL 512  
ZONED: NEW TOWN

HOWARD COUNTY, MARYLAND  
TAX MAP 35, PARCEL 512  
ZONED: NEW TOWN

LEGEND	
SYMBOL	DESCRIPTION
---	EXISTING 2' CONTOURS
---	EXISTING 10' CONTOURS
---	PROPOSED CONTOURS
x 362.2	SPOT ELEVATION
-SF-	SILT FENCE
---	EXISTING TREE LINE
---	PROPOSED TREE LINE
---	SHEET FLOW (5% MAX.)
---	DISCONNECTED IMPERVIOUS AREA
---	DISCONNECTED RECEIVING AREA
---	SOIL LINES AND TYPES
○	DENOTES PROPOSED WELL
○	DENOTES FAILED PERC
○	DENOTES PASSED PERC
---	LIMIT OF DISTURBANCE
---	EXISTING TREES



**DRY WELL DETAIL (M-5)**  
NOT TO SCALE



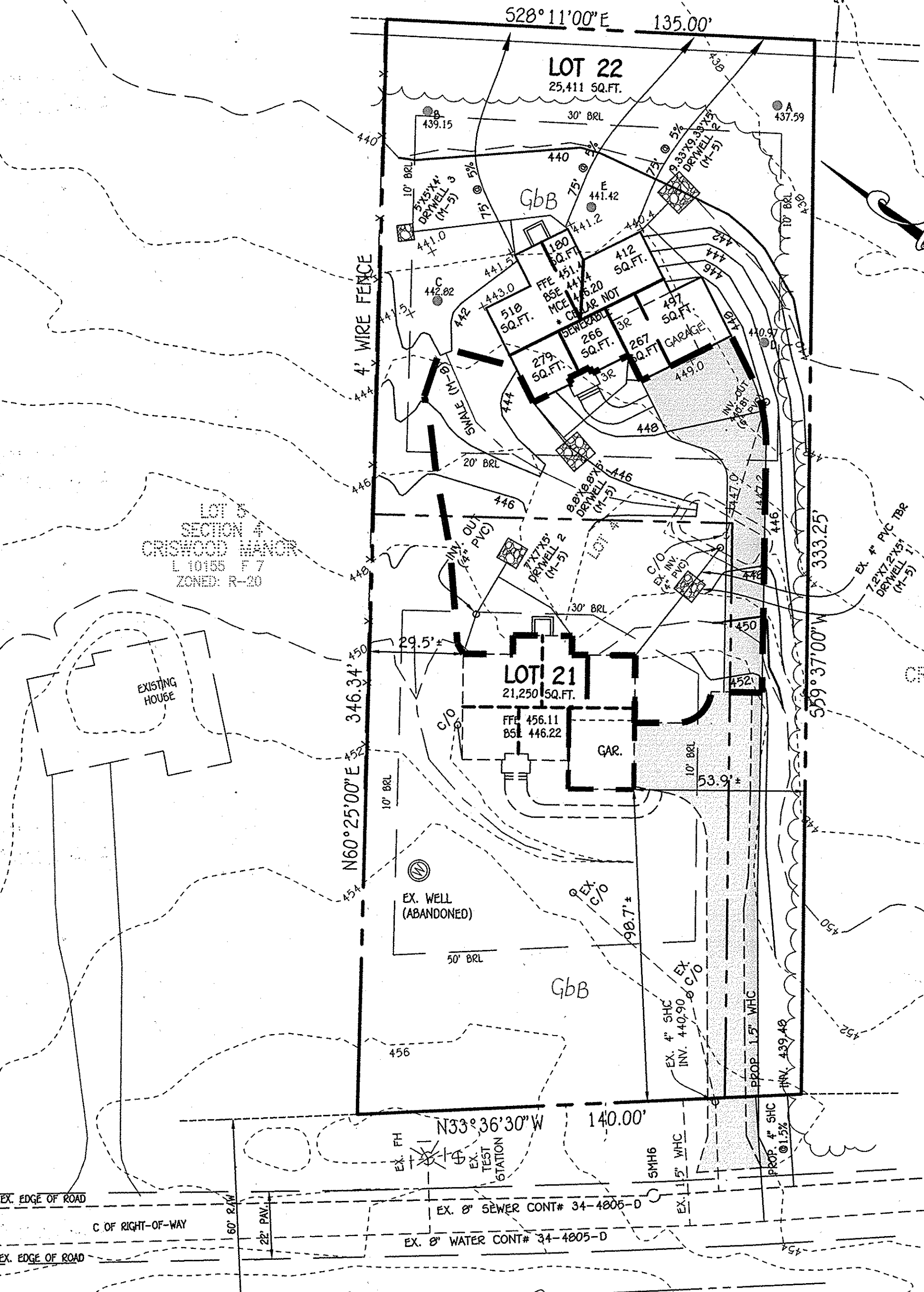
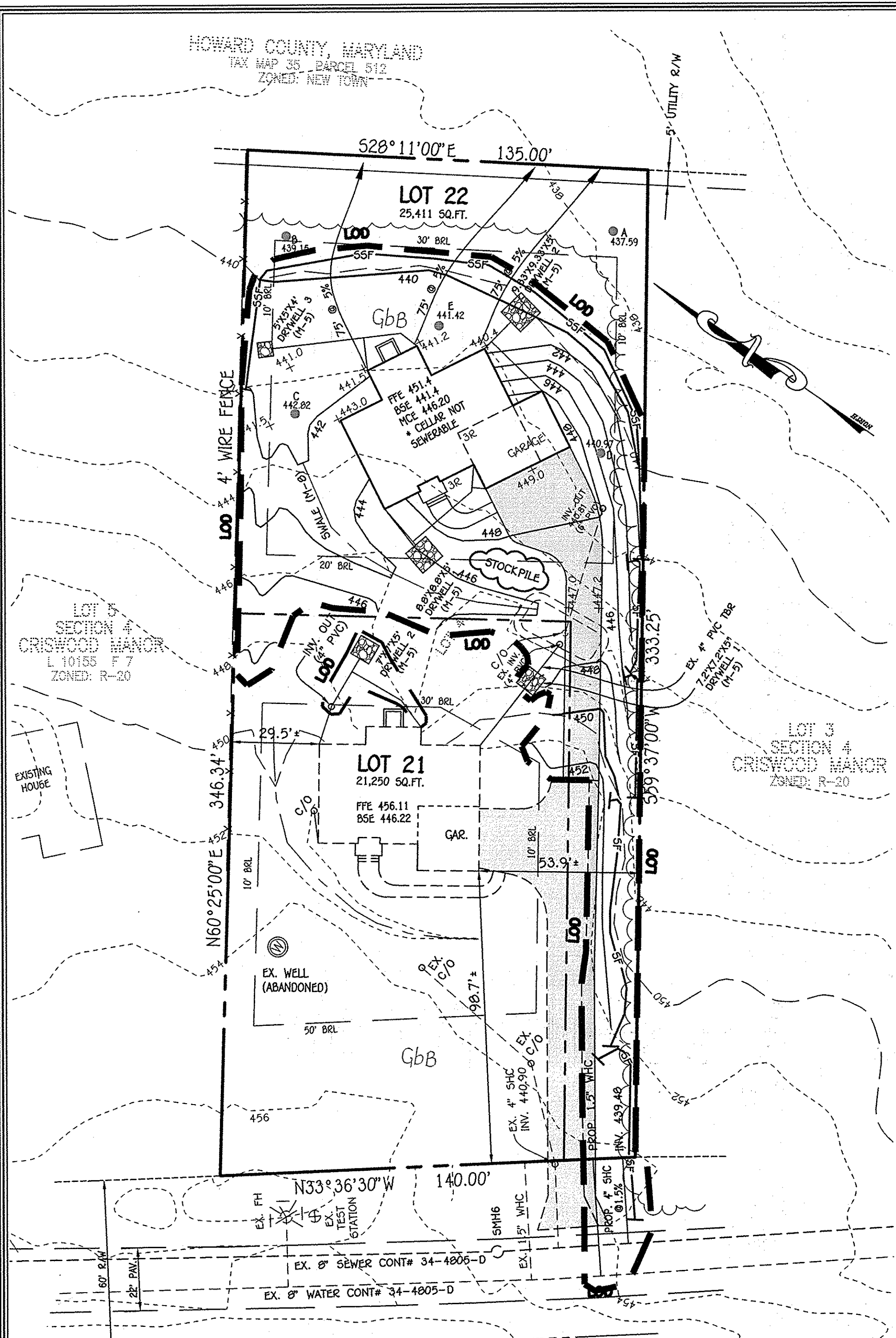
**GUTTER DRAIN FILTER DETAIL**  
NOT TO SCALE

**STORMWATER MANAGEMENT NOTES**

1. STORMWATER MANAGEMENT IS PROVIDED IN ACCORDANCE WITH CHAPTER 5, "ENVIRONMENTAL SITE DESIGN" OF THE 2007 MARYLAND STORMWATER MANAGEMENT DESIGN MANUAL, EFFECTIVE MAY 4, 2010.
2. MAXIMUM CONTRIBUTING ROOF TOP AREA TO EACH DOWNSPOUT SHALL BE 1,000 SQ. FT. OR LESS.
3. DRYWELLS SHALL BE PROVIDED AT LOCATIONS WHERE THE LENGTH OF DISCONNECTION IS LESS THAN 75' AT 5%. THE SIZE AND CONSTRUCTION OF THE DRYWELL SHALL BE IN ACCORDANCE WITH THE DETAIL SHOWN ON THIS SHEET.
4. FINAL GRADING IS SHOWN ON THIS SITE DEVELOPMENT PLAN.

DRY WELL CHART					
DRYWELL NO.	AREA OF ROOF PER DOWN SPOUT	VOLUME REQUIRED	VOLUME PROVIDED	AREA OF TREATMENT	L D W
21 (1)	783 SQ. FT.	112 C.F.	113 C.F.	100%*	7.2' x 7.2' x 5'
21 (2)	765 SQ. FT.	110 C.F.	113 C.F.	100%*	7' x 7' x 5'
22 (1)	812 SQ. FT.	116 C.F.	116 C.F.	100%*	8.8' x 8.8' x 5'
22 (2)	909 SQ. FT.	130 C.F.	131 C.F.	100%*	9.33' x 9.33' x 5'
22 (3)	698 SQ. FT.	23 C.F.	24 C.F.	100%*	5' x 5' x 4'

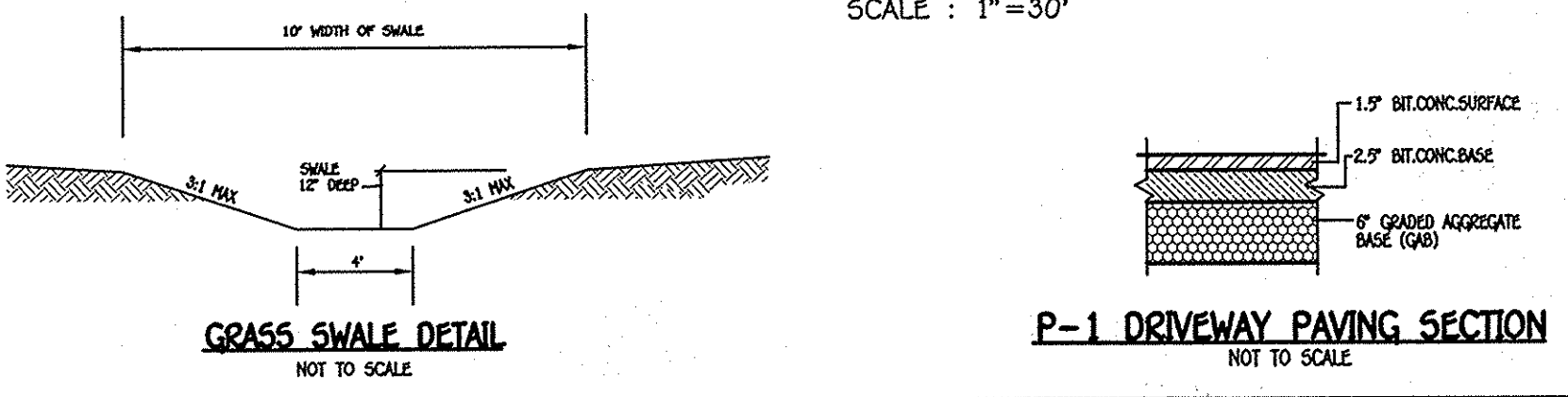
\* AREA OF TREATMENT EXCEEDS THAT REQUIRED.



**TROTTER ROAD**  
(60' R/W) ~ (LOCAL ROAD)

**TROTTER ROAD**  
(60' R/W) ~ (LOCAL ROAD)

**SEDIMENT & EROSION CONTROL PLAN**  
SCALE: 1" = 30'

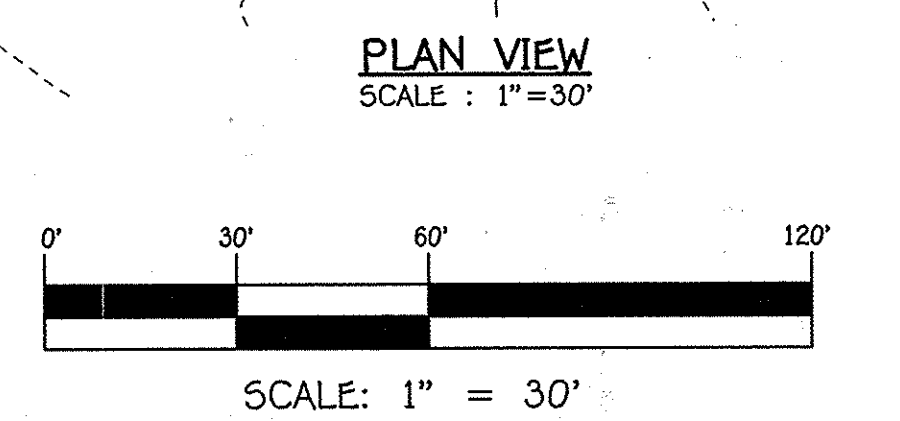


**GRASS SWALE DETAIL**  
NOT TO SCALE

**P-1 DRIVEWAY PAVING SECTION**  
NOT TO SCALE

**OPERATION & MAINTENANCE SCHEDULE FOR PRIVATELY OWNED AND MAINTAINED DRY WELLS (M-5)**

- A. THE OWNER SHALL INSPECT THE MONITORING WELLS AND STRUCTURES ON A QUARTERLY BASIS AND AFTER EVERY HEAVY STORM EVENT.
- B. THE OWNER SHALL RECORD THE WATER LEVELS AND SEDIMENT BUILD UP IN THE MONITORING WELLS OVER A PERIOD OF SEVERAL DAYS TO ENSURE TRENCH DRAINAGE.
- C. THE OWNER SHALL MAINTAIN A LOG BOOK TO DETERMINE THE RATE AT WHICH THE FACILITY DRAINS.
- D. WHEN THE FACILITY BECOMES CLOGGED SO THAT IT DOES NOT DRAIN DOWN WITHIN A SEVENTY-TWO (72) HOUR TIME PERIOD, CORRECTIVE ACTION SHALL BE TAKEN.
- E. THE MAINTENANCE LOG BOOK SHALL BE AVAILABLE TO HOWARD COUNTY FOR INSPECTION TO INSURE COMPLIANCE WITH OPERATION AND MAINTENANCE CRITERIA.
- F. ONCE THE PERFORMANCE CHARACTERISTICS OF THE INFILTRATION FACILITY HAVE BEEN VERIFIED, THE MONITORING SCHEDULE CAN BE REDUCED TO AN ANNUAL BASIS UNLESS THE PERFORMANCE DATA INDICATES THAT A MORE FREQUENT SCHEDULE IS REQUIRED.



NO.	REVISION	DATE	X

**PROFESSIONAL CERTIFICATION**

I HEREBY CERTIFY THAT THESE DOCUMENTS WERE PREPARED OR APPROVED BY ME AND THAT I AM A DULY LICENSED PROFESSIONAL ENGINEER UNDER THE LAWS OF THE STATE OF MARYLAND, LICENSE NO. 38386, EXPIRATION DATE: 01/12/2016.

*Stephanie Jantz 6/30/14*  
Signature of Professional Engineer DATE

**OWNER/DEVELOPER**

THOMAS V. SAHUEL & SISSY M. AMBLY  
5517 TROTTER ROAD  
CLARKSVILLE, MARYLAND 21029  
301-552-0005

APPROVED: HOWARD COUNTY DEPARTMENT OF PLANNING AND ZONING

*K. S. ...* 7/27/14  
Chief, Division of Land Development Date

*M. ...* 7-8-14  
Chief, Development Engineering Division Date

PROJECT	CRISWOOD MANOR	SECTION	4	LOT NO.	4
DEED	12539/403	BLOCK NO.	0020	TAX/ZONE	R-20 0029
ELEC. DIST.	FIFTH	CENSUS TR.	6068.02		

**ENVIRONMENTAL CONCEPT PLAN**

**CRISWOOD MANOR**  
SECTION 4, LOTS 21 & 22

ZONED R-20

TAX MAP No. 29 GRID No. 20 PARCEL No. 88  
FIFTH ELECTION DISTRICT HOWARD COUNTY, MARYLAND  
SCALE: AS SHOWN DATE: JUNE, 2014  
SHEET 2 OF 2

**ECF-14-080**