

SEPA ENVIRONMENTAL CHECKLIST

Purpose of checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants:

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for Lead Agencies:

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals:

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (part D). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

A. Background [\[HELP\]](#)

1. Name of proposed project, if applicable:

PFAS Treatment Facilities, Hoffman Hill and Bell Hill

2. Name of applicant:

**City of DuPont
1700 Civic Drive
DuPont, WA 98327**

3. Address and phone number of applicant and contact person:

**Barbara Kincaid
Public Services Director
City of DuPont
1700 Civic Drive
DuPont, WA 98327
(253) 912-5393**

4. Date checklist prepared:

October 28, 2022

5. Agency requesting checklist:

City of DuPont

6. Proposed timing or schedule (including phasing, if applicable):

Construction is anticipated to start in the Spring of 2023 and will end in the Fall of 2023.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

There are currently no additional plans for expansion connected to the PFAS Treatment Facilities at Hoffman Hill and at Bell Hill..

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

Geotechnical Engineering Report, Stormwater Memo and Cultural Resources Assessment have been prepared for both the Hoffman Hill and Bell Hill Sites.

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

None.

10. List any government approvals or permits that will be needed for your proposal, if known.

City of DuPont Land Use Approval for both sites.

City of DuPont Conditional Use Permit for Hoffman Hill.

City of DuPont Building Permit for treatment plant for both sites.

City of DuPont Grading and Civil Construction Permit for both sites.

City of DuPont Building Permit for wellhouse building expansion at Hoffman Hill.

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

The PFAS Treatment Facilities project proposal consists of two sites, Hoffman Hill and Bell Hill.

The Hoffman Hill site proposal includes a 1778 square foot foundation concrete pad, 3 sets of two 12-foot carbon treatment vessels, 114 linear feet of 3 foot tall retaining wall, an on-site chlorine generator, and extensive site piping changes. The existing site is 1.77 acres and includes Hoffman Hill reservoir, Well 1, booster station, and a cell tower. The site can be accessed from Foreman Road.

The Bell Hill site proposal includes a 1753 square foot foundation concrete pad, 3 sets of two 12-foot carbon treatment vessels, and extensive site piping changes. The existing site is 2.85 acres and includes Bell Hill reservoir, Wells 1 and 2, and booster station. The site can be accessed from Bell Hill Place.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

The PFAS Treatment Facilities-Hoffman Hill Site project is located on an access road at the intersection of Forman Road and Packwood Avenue. The site tax parcel number is 0119331004, Section 33 Township 19 Range 01.

The PFAS Treatment Facilities-Bell Hill Site project is located off of Bell Hill Place. The site tax parcel number is 0119252010, Section 25 Township 19 Range 01.

B. Environmental Elements [\[HELP\]](#)

1. Earth [\[help\]](#)

a. General description of the site:

(circle one): Flat, rolling, hilly, steep slopes, mountainous, other _____

b. What is the steepest slope on the site (approximate percent slope)?

The Hoffman Hill Site has a steepest slope of approximately 40 percent.

The Bell Hill Site has a steepest slope of approximately 40 percent.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

The Hoffman Hill site and its vicinity are underlain by loose to very dense Ice-contact deposits (Geologic Map Unit Qgoi). Ice-contact deposits generally consists of a mixture of sand, silt, and gravel.

The Bell Hill site and its vicinity are underlain by loose to medium dense Recessional Outwash gravel (Steilacoom Gravel, Qgsog). Steilacoom Gravel typically consists of pebble to boulder size gravel.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

No.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

The proposed project would require earthwork activities at both sites, including filling and excavation for foundations, utilities, and a retaining wall at Hoffman Hill. The Bell Hill site slopes to the north, the proposed site grades will require movement of on-site soils to re-contour the site for proposed improvements.

Hoffman Hill: The existing soils maybe used for non-structural fill so little if any will be need to be imported. Approximately 191 CY of the existing material will be cut for site improvements. Approximately 95 CY of the cut material may be used in fill areas and the remaining would be hauled off site. 12 inches of foundation gravel will be imported from a gravel pit in Pierce County for all structures for approximately 78 cubic yards.

Bell Hill: Approximately 73 CY of the existing material will be cut for site improvements. Approximately 17 CY of the cut material may be used in fill areas and the remaining would be hauled off site. 12 inches of foundation gravel will be imported from a gravel pit in Pierce County for all structures for approximately 67 cubic yards.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

Yes, erosion could occur as a result of construction activities, however, a temporary erosion and sedimentation control plan will be designed and implemented according to Best Management Practices (BMP).

After construction is complete and vegetation is established on exposed soils, the potential for erosion on the sites will be reduced.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

The Hoffman Hill Site will be about 63% covered with impervious surfaces after project construction. The Bell Hill Site will be about 41% covered with impervious surfaces after project construction.

The Hoffman Hill site tax parcel is approximalety 62,200 SF currently with 36,600 SF of impervious surfaces.

The Bell Hill site tax parcel is approximalety 30,500 SF currently with 10,700 SF of impervious surfaces.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

A plan incorporating Best Management Practices (BMP) for erosion control will be submitted to the City. The project will meet or exceed the engineering design standards for erosion control. Measures expected to be used include: seeding, fertilizing, and mulching as soon as possible; roughening the ground surface prior to seeding; construction during dry season; catch basin filters; silt fences, and temporary cover of disturbed areas.

2. Air [\[help\]](#)

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

Air emissions will occur from construction equipment during construction of the facility. Quantities are unknown.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

According to the Olympic Regional Clean Air Agency (ORCAA) there are no off site emission sources near the project site.

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

The project will fully implement applicable US Environmental Protection Agency, Washington State Department of Ecology and Puget Sound Clean Air Agency standards and requirements governing air quality with construction of the treatment systems.

3. Water [\[help\]](#)

a. Surface Water: [\[help\]](#)

- 1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

Edmond Marsh is located approximately 100 feet north of the Bell Hill site. Bell Marsh is located approximately 500 feet south of the Bell Hill site. No surface water body is in the vicinity of the Hoffman Hill site.

2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

Yes, work will be done within 200 feet of the Edmond Marsh. However, the work is within the existing fence line of the existing Bell Hill Reservoir, Booster Station and Wells.

3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

No fill or dredge material will be placed in or removed from surface waters.

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

No surface water withdrawals or diversions will be made.

5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

Neither site is located within a 100-year flood plain.

6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

No waste materials will be discharged to surface water.

b. Ground Water: [\[help\]](#)

1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.

This proposal does not affect the amount groundwater withdrawn. The project provides for the treatment of the City's drinking water sources. Quantities are within existing City water rights, as approved by the Departments of Health and Ecology in the current City Water System Plan.

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

No waste material will be discharged to the ground.

c. Water runoff (including stormwater):

- 1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

For the Hoffman Hill Site, the source of runoff will be rainfall from building roof areas, pavement areas, plus the concrete pad and steel vessels. Stormwater will be collected and conveyed through existing catch basins prior to entering the existing stormwater pond offsite to the north located at Sinclair Drive and Ridge View Drive.

For the Bell Hill Site, the source of runoff will be rainfall from the concrete pad and steel vessels. The stormwater will be directed by sheet flow to the surrounding landscaped areas. The new impervious surface associated with the water treatment facilities is “non-pollution generating.”

- 2) Could waste materials enter ground or surface waters? If so, generally describe.

No waste materials are generated under this proposal.

- 3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

No.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

Storm drainage collection systems will be designed and constructed per City of DuPont Standards to control surface runoff at each site.

4. Plants [\[help\]](#)

a. Check the types of vegetation found on the site:

deciduous tree: alder, maple, aspen, other
 evergreen tree: fir, cedar, pine, other
 shrubs
 grass
 pasture
 crop or grain
 Orchards, vineyards or other permanent crops.
 wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
 water plants: water lily, eelgrass, milfoil, other
 other types of vegetation

b. What kind and amount of vegetation will be removed or altered?

Existing grass and weeds, roughly 2,500 square feet at each site.

c. List threatened and endangered species known to be on or near the site.

None known.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

Proposed landscaping will be examined for compliance with DuPont Municipal Code DMC 25.90 regarding landscaping with review of the land use application.

e. List all noxious weeds and invasive species known to be on or near the site.

Scot's Bloom is present near each site.

5. Animals [\[help\]](#)

a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site.

Examples include:

birds: hawk, heron, eagle, **songbirds**, other:
mammals: **deer**, bear, elk, beaver, other:
fish: bass, salmon, trout, herring, shellfish, other _____

b. List any threatened and endangered species known to be on or near the site.

Washington State Department of Fish and Wildlife Habitats and Species Maps indicate the following endangered animal species located within the proposed sites: Big Brown Bat, Yuma Myotis, and the Little Brown Bat.

c. Is the site part of a migration route? If so, explain.

Yes, the sites are part of the Pacific Flyway for Migratory Birds.

d. Proposed measures to preserve or enhance wildlife, if any:

Landscaping will be in accordance with City of DuPont Standards to preserve and enhance wildlife.

e. List any invasive animal species known to be on or near the site.

None known.

6. Energy and Natural Resources [\[help\]](#)

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

Electricity is available to each site. Electricity will be used for the chlorine generators and their respective accessory equipment on each site.

b. Would your project affect the potential use of solar energy by adjacent properties?
If so, generally describe.

No.

c. What kinds of energy conservation features are included in the plans of this proposal?
List other proposed measures to reduce or control energy impacts, if any:

The project will comply with all state energy code requirements. No other specific measures are proposed.

7. Environmental Health [\[help\]](#)

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal?
If so, describe.

1) Describe any known or possible contamination at the site from present or past uses.

The presence of arsenic and lead are likely from possible air-fall contamination which may have resulted from the past ore smelting operations in Tacoma as outlined in the Area Wide Soil Task Force Report (AWSTFR) published June 2003 by the Washington State Department of Ecology. The AWSTFR has defined concentrations of total arsenic less than 200mg/kg to be within the low to moderate range for commercial properties such as the subject sites. The subject sites fall within a potential impact zone on a map of Washington State depicting the potentially affected areas.

2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

Other than a minor potential for arsenic from the Asarco plume, none are known to exist on or near the sites.

3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

During construction, chemicals associated with construction equipment would be on the sites. Upon project completion, it is not anticipated that hazardous materials would be present. The treatment vessels on each site will be filled with activated carbon which will have to be replaced during the life of the project.

4) Describe special emergency services that might be required.

No special emergency services are anticipated.

5) Proposed measures to reduce or control environmental health hazards, if any:

No measures are proposed.

b. Noise

- 1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

None known.

- 2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

On a short term basis, noise from construction equipment would be present from approximately 7 am to 6 pm, Monday through Friday. No long-term noise is anticipated to be added to the current noise levels for operation of pumps and generators at each site.

- 3) Proposed measures to reduce or control noise impacts, if any:

During the construction phase of the project, construction equipment will be maintained and meet noise ordinance. The use of on-site and perimeter landscaping will help to reduce and control noise created by the proposed developments.

8. Land and Shoreline Use [\[help\]](#)

- a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

The current use of the properties surrounding the Hoffman Hill site is residential. The property to the south of the Bell Hill site is a public park, Bell Hill Community Park. The property to the east of the Bell Hill site is residential. The project will not effect any of these adjacent properties.

- c. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

To our knowledge, the sites have not been used as working farm lands or forest lands and no lands of commercial significance will be converted to other uses.

- 1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:

There are no working farm or forest lands near the site.

- c. Describe any structures on the site.

There are a well house, a reservoir, and a booster pump station at each site.

d. Will any structures be demolished? If so, what?

No structures will be demolished.

e. What is the current zoning classification of the site?

The Hoffman Hill site is classified as Residential 4 and the Bell Hill site is classified as Manufacturing Research Park.

f. What is the current comprehensive plan designation of the site?

The Hoffman Hill site is designated by the Comprehensive Plan as Residential 4 and the Bell Hill site is designated by the Comprehensive Plan as Manufacturing and Research.

g. If applicable, what is the current shoreline master program designation of the site?

N/A.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

No.

i. Approximately how many people would reside or work in the completed project?

No change to the number of people visiting/working at the sites will occur due to the project.

j. Approximately how many people would the completed project displace?

No people will be displaced due to the project.

k. Proposed measures to avoid or reduce displacement impacts, if any:

N/A.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

Permitted use in the Residential Zoning Districts are stated in DMC 25.20.020 and will be followed as such for the Hoffman Hill site. Permitted use in the Manufacturing Research Park Zoning Districts are stated in DMC 25.45.020 and will be followed as such for the Bell Hill site.

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:

N/A.

9. Housing [\[help\]](#)

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

N/A.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

N/A

c. Proposed measures to reduce or control housing impacts, if any:

N/A

10. Aesthetics [\[help\]](#)

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

The tallest height of the carbon vessels on each site will be 27 feet. The carbon vessels will be painted steel.

b. What views in the immediate vicinity would be altered or obstructed?

Views from the east of the Bell Hill site and all around the Hoffman Hill site will be minimally altered.

d. Proposed measures to reduce or control aesthetic impacts, if any:

The project is being designed to meet current City of DuPont design codes.

11. Light and Glare [\[help\]](#)

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

No light glare is expected to be produced at either site.

b. Could light or glare from the finished project be a safety hazard or interfere with views?

It is not anticipated that light or glare created by the proposed project would create safety hazards or interfere with views.

c. What existing off-site sources of light or glare may affect your proposal?

None.

d. Proposed measures to reduce or control light and glare impacts, if any:

The painted steel on the carbon vessels will minimize any glare.

12. Recreation [\[help\]](#)

- a. What designated and informal recreational opportunities are in the immediate vicinity?

Bell Hill Community Park is located to the south of the Bell Hill site.

- b. Would the proposed project displace any existing recreational uses? If so, describe.

The project will not displace any recreational uses.

- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

No specific measures are proposed.

13. *Historic and cultural preservation* [\[help\]](#)

- a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers ? If so, specifically describe.

None are known to exist on or near the sites to our knowledge.

- b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

A Cultural Resources Assessment was performed at each site. This assessments determined no historic properties would be affected by the project.

- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

If project activities result in the discovery of archeological materials, project staff will be directed to halt work in the immediate area until the technical staff at DAHP and representatives of the identified area Tribes have been contacted and their investigations have been concluded. In the event human remains are inadvertently revealed, project staff will immediately stop work, cover, and secure remains against further disturbance, and contact law personell, consistent with RCW 27.44.055 and RCW 68.60.005.

- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

According to the Cultural Resources Assessments, no resources were identified during field investigations. It is unlikely that they exist, and no further investigations are recommended. An Inadvertent Discovery Plan will be included in the construction documents.

14. *Transportation* [\[help\]](#)

a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

**Access to the Hoffman Hill site will be via an access road off of Foreman Road.
Access to the Bell Hill site will be via Bell Hill Place.**

b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

No. The nearest transit stop is located at DuPont Station.

c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

The proposal would not eliminate or add any parking spaces.

d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

No.

e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

No.

f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

The proposed project would only increase vehicular trips by two per year for the carbon media exchange.

g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

There are no working farms or forest lands near the sites.

h. Proposed measures to reduce or control transportation impacts, if any:

No impacts are anticipated.

15. Public Services [\[help\]](#)

a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

The proposed project will not increase the need for public services.

b. Proposed measures to reduce or control direct impacts on public services, if any.

None.

16. Utilities [\[help\]](#)

a. Circle utilities currently available at the site:

electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other _____

e. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

Electricity	Puget Sound Energy
Water	City of DuPont
Sanitary Sewer	Pierce County Utilities
Telephone	Lumen

C. Signature [\[HELP\]](#)

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: 

Name of signee Dominic J. MILLER

Position and Agency/Organization GRAY & OSBORNE, INC.

Date Submitted: 10/31/22