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CAPE COD
COMMISSION

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LIMITED DEVELOPMENT OF REGIONAL IMPACT DECISION

DATE: MARCH 17, 2016

TO: ATTY. MICHAEL D. FORD
PO BOX 485, WEST HARWICH, MA 02671

PROJECT APPLICANT: NRG RENEW CANAL 1 LLC
9 FREEZER ROAD, SANDWICH, MA 02563

PROPERTY OWNER: NRG CANAL LLC
9 FREEZER ROAD, SANDWICH, MA 02563

PROJECT NUMBER: LR/TR15020

PROJECT: CANAL COMMUNITY SOLAR, SANDWICH, MA

PROJECT SITE/LOCATION: TUPPER ROAD, SANDWICH, MA

TITLE INFORMATION: BOOK 11961 PAGE 226
PLAN BOOK 546 PAGE 42

ASSESSOR'S ID: MAP 86 PARCELS 13 & 15

SUMMARY

The Cape Cod Commission (Commission) hereby approves the application by NRG Renew Canal 1 LLC as a Limited Development of Regional Impact (DRI) pursuant to sections 12 and 13 of the *Act Establishing the Cape Cod Commission*, c. 716 of the Acts of 1989, as amended, (Act) and Sections 3, 5, and 7 of the Commission's *Enabling Regulations*, as amended, (*Enabling Regulations*), for the construction of the proposed 1.5-MW ground-mounted photovoltaic energy facility located at Tupper Road in Sandwich, MA (Project). The Project is also subject to a DRI Scoping Decision dated December 21, 2015 in which DRI review was limited in scope to the Regional Policy Plan (RPP) issue or sub-issue areas of Water Resources (Goals WR1 and WR7), Wildlife and Plant Habitat, and Open Space. This decision is rendered pursuant to a vote of the Commission on March 17, 2016

PROJECT DESCRIPTION

The Applicant is proposing to develop a 20.6-acre site with a 1.5-MW ground-mounted photovoltaic energy facility accessed via an existing gravel drive extending from Tupper Road. According to the application materials, the Project will require the disturbance of 10.6 acres of the site. The area of the Project and its associated disturbance primarily contains forested upland. The Project will connect to existing overhead power distribution infrastructure owned by Eversource along Route 6A. The Project is intended to be part of the Applicant's comprehensive approach to its operations at the existing plant along the Cape Cod Canal.

PROCEDURAL HISTORY

The Applicant filed an Expanded Environmental Notification Form (EENF) for both the Project and a 330MW dual-fueled electric generating facility; the Applicant requested a Phase 1 Waiver for the Project. The Commission submitted a comment letter to the MEPA office on the EENF; the comments included support for the Phase 1 Waiver. The Secretary of EEA issued a certificate on the EENF and granted a Phase I Waiver for the Project on October 9, 2015. The Phase 1 Waiver allows the Project to proceed to DRI review without further review under MEPA, and prior to DRI review for other work described in the EENF (that other work will require both EIR and DRI review).

The DRI Scoping application was received by the Commission on November 6, 2015. The DRI Scoping application was deemed complete on December 7, 2015. The Executive Director issued a written Scoping Decision, dated December 21, 2015, limiting the scope of DRI review to the issue or sub-issue areas of Water Resources (Goals WR1 and WR7), Wildlife and Plant Habitat, and Open Space, which was accepted and adopted as final by the Committee on Planning and Regulation (CPR) at its public meeting on December 17, 2015.

The Limited DRI application from the Applicant was received by the Commission on January 19, 2016. The DRI referral from the Town of Sandwich Building Department was received by the Commission on January 29, 2016. The application was deemed complete sufficient to proceed to substantive public hearing on February 10, 2016.

The Limited DRI hearing was opened and testimony was taken by Jonathon Idman, Chief Regulatory Officer of the Commission serving as Hearing Officer, on March 2, 2016 at the Town of Sandwich Human Services Building located at 270 Old Quaker Meetinghouse Road, Sandwich, MA. The Hearing Officer continued the public hearing to the regularly scheduled meeting of the full Commission on March 17, 2016 at the Barnstable County Assembly of Delegates Chambers located at the First District Courthouse at 3195 Main Street in Barnstable, Massachusetts to consider project approval, and adoption of a draft Limited DRI decision.

JURISDICTION

The Project qualifies as a Development of Regional Impact (DRI) pursuant to Section 3(e) of the *Enabling Regulations* as an "Outdoor Use [proposing] new construction or development that has a Total Project Area greater than 40,000 square feet."

The Act and Section 7(c)(viii) of the *Enabling Regulations* contain the standards to be met for DRI approval, which include consistency with the Act, the RPP, Districts of Critical Planning Concern (DCPCs) (as applicable), the Town of Sandwich's municipal development by-laws, and the Town of Sandwich's Local Comprehensive Plan (LCP). The Commission must also find that the probable benefit from the proposed development is greater than the probable detriment.

FINDINGS

GENERAL FINDINGS

The Commission hereby finds as follows:

GF1. A referral from the Town of Sandwich Building Department was received on January 29, 2016, referring the Project to the Commission as a mandatory DRI.

GF2. As the date of the first public hearing was March 2, 2016, the Project was reviewed subject to the 2009 Regional Policy Plan (RPP), as amended in August 2012, which is the RPP in effect at the time the DRI Scoping decision on the Project was issued and accepted as final by the CPR.

GF3. Pursuant to Section 5 of the *Enabling Regulations*, the Applicant previously applied to limit the scope of DRI review, and after review of the application, the Executive Director issued a written Scoping Decision, dated December 21, 2015, to which this project is subject, limiting the scope of DRI review to the RPP issue or sub-issue areas of Water Resources (Goals WR1 and WR7), Wildlife and Plant Habitat, and Open Space, which decision was adopted and accepted as final by the CPR at its December 17, 2015 meeting.

GF4. The Project consists of development of a 20.6-acre site with a 1.5-MW ground-mounted photovoltaic energy facility accessed via an existing gravel drive extending from Tupper Road. According to the application materials, the Project will require the disturbance of 10.6 acres of the site. The area of the Project and its associated disturbance primarily contains forested upland. The Project will connect to existing overhead power distribution infrastructure owned by Eversource along Route 6A. The Project is styled as a community, or shared, solar project, allowing customers within NRG's local service area, who either can't or don't want to install solar arrays on their own properties, to subscribe to purchase shares of energy production from the Project and receive a credit on their electricity bill for their share of the Project's solar energy production.

GF5. The Project is to be implemented and constructed in accordance with the following plan set titled "Site Development Plans for Canal Community Solar Project" dated January 13, 2016 by Atlantic Design Engineers, Inc., and consistent with other information and documents referenced herein:

Sheet 1 of 10: *Title Sheet*

Sheet 2 of 10: *Overall Existing Conditions Plan*

Sheet 3 of 10: *Existing Conditions Plan*

Sheet 4 of 10: *Existing Conditions Plan*

Sheet 5 of 10: *Existing Conditions Plan*

Sheet 6 of 10: *Overall Site Development Plan*

Sheet 7 of 10: *Site Development Plan*

Canal Community Solar, Sandwich, MA

Limited DRI Decision

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Additional documents:

Natural Resource Inventory, prepared by TRC Environmental, dated 11/2015

Figure 3A – Proposed On-Site Open Space, prepared by Atlantic Design Engineers Inc., dated 2/12/2016

Figure 3B – Proposed off-Site Open Space, prepared by Atlantic Design Engineers Inc., dated 2/16/2016

Stormwater Drainage Analysis, prepared by Atlantic Design Engineers, Inc., dated 12/31/2015

Stormwater Operation & Maintenance Plan, prepared by Atlantic Design Engineers, Inc., dated 12/29/2015

GF6. Based on correspondence dated February 22, 2016, Blair Haney, Town of Sandwich Town Planner, and review by Commission staff, the Project is consistent with local development by-laws and the Town's LCP, subject to obtaining necessary local permits from the town. Specifically, the Project furthers LCP goals by reducing greenhouse gas emission related to the production and use of energy, and large-scale ground mounted photovoltaic installations are allowed by-right in the recently adopted Ground Mounted Solar Overlay Zoning District.

GF7. The Project Site is not located within a designated District of Critical Planning Concern (DCPC), other than the Cape-wide Fertilizer Management DCPC. Because no Town of Sandwich implementing regulations have been adopted and are in effect pursuant to that DCPC, there are no DCPC implementing regulations with which the Project must be consistent.

GF8. Finding HPCCF2 of the DRI Scoping decision found that given the fact that the proposed solar panels extend only 8 feet above grade level and the Project has a significant, naturally vegetated buffer and setback from developed areas and the regional roadway, the Project is unlikely to pose any detrimental visual impacts.

GF9. The probable benefits of the Project are:

1. The Project provides the opportunity for residents of Cape Cod to purchase renewable energy at an affordable and predictable cost, including those residents who either can't or don't want to install renewable energy equipment on their own properties.
2. The Project furthers the Community Sustainability goals of the Town of Sandwich LCP and the Massachusetts Green Communities Act, which encourage the development of renewable energy sources.

3. The Project re-purposes and updates, in part, the Canal Plant facility to produce renewable energy, giving new vitality to a critical piece of the region's energy infrastructure.
4. It is an appropriate and efficient use of land to locate new energy production infrastructure at an existing property currently and primarily developed with energy production infrastructure.

GF10. The probable detriment of the Project is:

1. The Project requires the clearing of 6.78 acres of forested upland, including the removal of a few large-caliper oak trees.

GF11. The probable benefit of the Project is greater than the probable detriment of the Project.

RPP ISSUE AREA OF WATER RESOURCES (GOALS WR1 AND WR7)

WRF1. The Applicant has provided nitrogen loading calculations indicating a 0.3655 ppm loading to groundwater, significantly less than the 5ppm standard required by MPS WR1.1 (Five-ppm Nitrogen Loading Standard).

WRF2. The area surrounding the Project Site is served by town water systems, thus identifying proposed and existing private drinking wells within 400 feet of the site and providing a groundwater study as required by MPS WR1.2 (Identification of Drinking Water Wells) and MPS WR1.3 (Groundwater Study Requirement) are not necessary.

WRF3. The Project will not withdraw water for irrigation and plans to use native vegetation in and around the solar panels, meeting MPS WR1.5 (Turf and Landscape Management Plan).

WRF4. All stormwater runoff created by the Project will be directed to onsite Best Management Practices (BMPs) and will be directly infiltrated, in compliance with MPS WR7.1 (No New Direct Discharges of Untreated Stormwater) and MPS WR7.2 (On-Site Infiltration). The site will be graded so that stormwater runoff is directed towards grassed swales, which discharge in to sediment forebays, which overflow in to bioinfiltration areas at the northern end of the parcel. The stormwater management system will achieve 94% removal of total TSS and 44% TSS removal prior to infiltrating in to the bioretention basins, exceeding removal requirements of WR7.2.

WRF5. Provided water quality volume calculations indicate that both sediment forebay volumes exceed the 1-inch storage volume, meeting MPS WR7.4 (Bioinfiltration Practices).

WRF6. Hydrologic modeling confirms that the total stormwater management system can accommodate the 24-hour, 25-year design storm, meeting MPS WR7.5 (Structured Infiltration Devices).

WRF7. In order to ensure a minimum of two foot separation to groundwater required by MPS WR7.8 (Minimum Two-foot Separation to Groundwater), test pits (TP-1 and TP-2) were dug in bioretention areas to estimate seasonal high groundwater. Water elevations in the test pit logs

and bottom elevations of the bioretention areas indicate an exceedance in this required separation, meeting the MPS.

WRF8. While the Project is being constructed, BMPs are to be employed, including erosion control barriers, sedimentation control devices, regular inspections of devices, and placement of hay bales, meeting MPS WR7.9 (Best Management Practices during Construction).

WRF9. Adequate maintenance and operation plans for the stormwater BMPs are included in the Applicant's *Stormwater Maintenance & Operation Plan*, consistent with MPS WR7.10 (Stormwater Maintenance and Operation Plan). As conditioned herein, the Project therefore meets MPS WR7.10 (Stormwater Maintenance and Operation Plan).

RPP ISSUE AREA OF WILDLIFE AND PLANT HABITAT

WPHF1. The Applicant provided a Natural Resources Inventory (NRI) consistent with the requirements of Technical Bulletin 92-002, as amended, meeting MPS WPH1.1 (Natural Resources Inventory).

WPHF2. MPS WPH1.2 (Clearing and Grading) directs development to minimize clearing and grading of a site and to protect standing specimen trees. The location of the two solar arrays on either side of an existing road through the site helps to reduce clearing needed to access the Project. The NRI identifies eight specimen trees located on the project site; five are located in the northwest portion of the site, which is within the 100 foot wetland buffer area and outside the work area. The Project was designed to avoid most impacts to the specimen trees. Two specimen trees (a 27" diameter breast height (dbh) white oak tree and a 24" dbh northern oak tree) are located within the mixed oak community in the area proposed for "solar array #2" and will be removed, as their removal could not be avoided given other site limitations. A specimen 61" dbh Norway Maple tree is located within the black locust community adjacent to Route 6A, which is part of the proposed on-site open space area to be preserved. Although Norway Maple is an invasive species, there is value in retaining this large tree as it provides habitat and aesthetic value to the site. To mitigate for the removal of the two specimen oak trees, and loss of their associated aesthetic and habitat values, the Applicant shall work with Commission staff, as a condition of this decision, to develop a mitigation plan to be implemented prior to issuance of a Final Certificate of Compliance.

WPHF3. The configuration of the site allows for wildlife travel between existing onsite habitat areas and wildlife corridors along the utility easements to undeveloped areas abutting the site to the east, west, and south to Shawme Crowell Forest across Route 6A. A proposed chain-link perimeter fence has been designed with a 6-inch gap to allow small wildlife to travel through the site. Thus, the Project meets WPH1.3 (Wildlife and Plant Habitat).

WPHF4. The Applicant has received correspondence from the Massachusetts Natural Heritage and Endangered Species Program certifying there is no mapped Priority Habitat within the proposed areas of disturbance by the Project, meeting MPS WPH1.4 (Rare Species).

WPHF5. There are no known vernal pools within the Project Site, meeting MPS WPH1.5 (Vernal Pools).

WPHF6. The NRI identifies several invasive plant species on the Project Site. MPS WPH1.6 (Invasive Species) requires applicants to provide and implement a plan for invasive species eradication (where possible) and management, as well as restoration with native species.

RPP ISSUE AREA OF OPEN SPACE PROTECTION AND RECREATION

OSF1. The Project Site is located within an Economic Center as mapped on the Town of Sandwich's Land Use Vision Map, thus MPS OS1.1 (Clustering of Development) does not apply.

OSF2. Based on the Project's location with an Economic Center, the Project must provide open space in a proportion of 2:1. Thus based on the Project's disturbance of 6.78 acres of forested upland, the Applicant must provide 3.39 acres of open space, consistent with MPS OS1.3 (Open Space Requirements). The Applicant has proposed to meet this requirement through the provision of 0.60 acre of open space on-site (as shown on *Figure 3A – Proposed On-Site Open Space*) and 2.8 acres of open space off-site (as shown on *Figure 3B – Proposed Off-Site Open Space*).

OSF3. Though not sizeable, the proposed on-site open space supports conservation and other values in the RPP. It is likely to provide a wildlife corridor between conservation land in the Town of Bourne abutting the Project Site and the Shawme State Forest located directly across Route 6A from the Project Site. Additionally, the proposed off-site open space abuts restricted wetland areas that may provide significant habitat value, and would permanently protect the vegetated visual buffer along Route 6A and along Town Neck Road, near a popular public beach. There is a large Norway Maple tree contained within the proposed on-site open space, which is an invasive species and generally recommended for removal. However, the habitat and aesthetic value of this tree remaining within the open space area is greater than the benefits of removing the tree. Thus, the Project meets MPS OS1.2 (Open Space Connections) and MPS OS1.3 subject to the Applicant placing the proposed open space under a permanent statutory conservation restriction to be approved by Commission staff.

OSF4. The proposed off-site open space supports and protects several conservation values and purposes: it is mapped priority habitat, and abuts wetlands resource areas, including a potential vernal pool.

CONCLUSION

Based on the above findings, the Commission further finds that:

1. Subject to the Conditions, below, the Project is consistent with the Regional Policy Plan and the applicable goals and minimum performance standards therein.
2. Based on correspondence dated February 22, 2016, Blair Haney, Town of Sandwich Town Planner, and review by Commission staff, the Project is consistent with local development by-

laws and the Town's Local Comprehensive Plan, subject to obtaining local permits for the Project.

3. The Project Site is not located within a designated District of Critical Planning Concern (DCPC), other than the Cape-wide Fertilizer Management DCPC. Because no Town of Sandwich implementing regulations have been adopted and in effect pursuant to that DCPC, there are no DCPC implementing regulations with which the Project must be consistent.

4. With specific emphasis on Findings GF9, GF10, and GF11 herein, the probable benefit of the Project is greater than its probable detriment.

5. The Commission hereby approves, with conditions, the Limited DRI application of NRG Renew Canal 1 LLC for the construction of the proposed 1.5-MW ground-mounted photovoltaic energy facility located at Tupper Road in Sandwich, MA subject to the following Conditions:

CONDITIONS

GENERAL CONDITIONS

GC1. This decision is valid for a period of 7 years and local development permits may be issued pursuant hereto for a period of 7 years from the date of this written decision.

GC2. This decision shall be appurtenant to and run with the property which is the subject Project Site. The decision shall bind and be enforceable against, and inure to the benefit of, the Applicant, its heirs, successors, agents, employees and assigns.

GC3. Failure to comply, and remain in compliance, with all findings and conditions state herein, and with all related Commission laws and regulations, shall be deemed cause to revoke or modify this decision.

GC3(a). This decision does not permit any other work or development at the Project Site, including tree and vegetation clearing and removal, except as authorized herein.

GC4. The Applicant shall obtain all necessary federal, state, and local permits for the Project. Specifically, prior to issuance of a Preliminary Certificate of Compliance, the Applicant shall obtain all necessary municipal discretionary permits, licenses and approvals for the Project, including but not limited to a Certificate of Appropriateness from the town's Old King's Highway Historic District Committee, and a flood plain development special permit (if one is deemed necessary).

GC4(a). The Project's consistency with municipal development by-laws or ordinances shall be evidenced and confirmed by the Applicant obtaining all said necessary municipal permits, licenses and approvals.

GC5. No local permitting or permitting review for development work as approved herein, including but not limited to site work and installation of foundations or footings, shall be undertaken until this decision is final and the Commission Clerk certifies in writing that the

decision appeal period has elapsed or if such an appeal has been filed, until the appeal has been finally dismissed, or is adjudicated or otherwise disposed of in favor of the Applicant.

GC6. The Project shall be undertaken, constructed and maintained in accordance with the Findings and Conditions set out herein, including the plan sets and other information and documents referenced herein under Finding GF5. Changes to the approved Project shall require modification to this decision, in accordance with the *Modification* section of the Commission's *Enabling Regulations* then in effect when such modification is sought. All other plans and documents required to be submitted as conditions of this decision shall hereby be incorporated into this decision as and when received, reviewed, and approved by Commission staff.

GC6(a). The Project shall be undertaken, constructed and maintained consistent with the terms and conditions of the December 21, 2015 DRI Scoping decision for the Project, these terms and conditions of which are hereby incorporated by reference into this decision.

GC7. Prior to issuance of a Building Permit or undertaking any development as approved herein, including but not limited to site work and installation of foundations or footings, the Applicant shall obtain a Preliminary Certificate of Compliance from the Commission that evidences that all conditions in this decision required to have been satisfied prior to the issuance of a Preliminary Certificate of Compliance have been satisfied, and that the Project is in compliance with this decision.

GC8. Prior to issuance of any Preliminary Certificate of Compliance by the Cape Cod Commission for development as approved herein, the Applicant shall submit final project plans as approved, and permits, licenses and approvals issued, by state, federal, and local authorities for review by Commission staff who shall determine their consistency with this decision. If Commission staff determines that the final plans are not consistent with those project plans approved, referenced and incorporated herein, the Commission shall require that the Applicant seek a modification to this decision for further review and approval of the project plan changes in accordance with the "*Modification*" section of the Commission's *Enabling Regulations* in effect at the time the modification is sought.

GC9. Prior to issuance of a Preliminary Certificate of Compliance, but not until the appeal period for this decision has elapsed, or if such an appeal has been filed, until the appeal has been finally dismissed, or adjudicated or otherwise disposed of in favor of the Applicant, the Commission shall record a copy of this decision with the Barnstable Registry of Deeds, with recording costs borne by the applicant. This decision shall not be effective until a copy of the same has been so recorded.

GC10. Prior to issuance of a Preliminary Certificate of Compliance, the Applicant shall provide written proof to the Commission that a copy of this decision has been received by the Project general contractor(s).

GC11. Prior to building permit sign-off for the project by the Town, the Applicant shall obtain a Final Certificate of Compliance from the Commission that evidences that all conditions in this

decision required to have been satisfied prior to issuance of a Final Certificate of Compliance have been satisfied and that the Project is in compliance with this decision.

GC12. Commission staff will undertake a review of the Project's compliance with this decision, including the applicable conditions hereof, upon the Applicant's request to the Commission for issuance of a Preliminary or Final Certificate of Compliance. At the time the Applicant requests such a certificate, it shall provide Commission staff a list of key project contact(s), along with their telephone numbers, mailing addresses, and email addresses, in the event questions arise during the Commission's compliance review. As part of its compliance review, Commission staff may make, and the Applicant hereby authorizes, a site inspection, as needed, at reasonable times and upon reasonable notice to the Applicant. Upon review, the Commission shall either prepare and issue the requested Certificate, or inform the Applicant in writing of any compliance deficiencies and the remedial action required for the issuance of the requested Certificate.

GC13. Changes to the Project shall require that the Applicant seek a modification to this decision for further review and approval in accordance with the "*Modification*" section of the Commission's *Enabling Regulations* in effect at the time the modification is sought.

GC14. The Project shall maintain a significant, naturally vegetated buffer and setback from developed areas and the regional roadway as shown on project plans approved herein.

GC15. The Applicant shall not use herbicides in its construction or landscape maintenance activities on the Project Site, except as such use may be reviewed and approved by Commission staff in an invasive species management plan.

WATER RESOURCES CONDITIONS

WRC1. Pursuant to MPS WR7.10 (Stormwater Operation and Maintenance Plan), one year from completion of the stormwater system, or prior to the issuance of a Final Certificate of Compliance, as the case may be, a Professional Engineer shall inspect the system and submit a letter to Commission staff certifying that the system was installed and functions as designed and approved.

WILDLIFE AND PLANT HABITAT CONDITIONS

WPHC1. The Applicant shall provide to Commission staff for review and approval an invasive species management plan for the Project (specifically, for management of invasive species identified in the Applicant's site-wide Natural Resources Inventory) prior to issuance of Preliminary Certificate of Compliance by the Commission. The Applicant shall undertake and maintain the development according to said plan after it is reviewed and approved by Commission staff.

WPH2. As mitigation for removal of the two oak specimen trees, the Applicant shall provide a mitigation plan for review and approval by Commission staff prior to issuance of a Preliminary Certificate of Compliance. The mitigation plan may include, among other things, proposed tree

replanting, provision of additional protected open space, and other elements acceptable to Commission staff, or a combination of thereof. Such mitigation plan shall be implemented prior to issuance of a Final Certificate of Compliance.

OPEN SPACE CONDITIONS

OSC1. The Applicant shall provide a draft conservation restriction (which identifies a grantee) and corresponding conservation restriction plan on the proposed open space areas referenced herein to Commission staff for review and approval prior to issuance of a Preliminary Certificate of Compliance. The Applicant shall record or register, as the case may be, a permanent statutory conservation restriction and plan pursuant to MGL Chapter 184 ss. 31-33 as reviewed and approved by Commission staff on the proposed open space and provide to Commission staff a recorded/registered copy of the same prior to issuance of a Final Certificate of Compliance.

SEE NEXT PAGE FOR SIGNATURES

SIGNATURES

Executed this 17th day of March 2016.

Signature *Richard E. Roy*

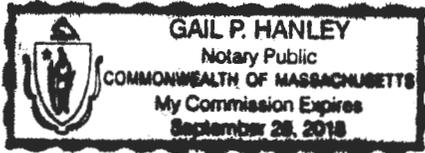
Print Name and Title Richard E. Roy Chairman

COMMONWEALTH OF MASSACHUSETTS

Barnstable, ss March 17, 2016

Before me, the undersigned notary public, personally appeared Richard E. Roy,

in his/her capacity as Chairman of the Cape Cod Commission, whose name is signed on the preceding document, and such person acknowledged to me that he/she signed such document voluntarily for its stated purpose. The identity of such person was proved to me through satisfactory evidence of identification, which was [] photographic identification with signature issued by a federal or state governmental agency, [] oath or affirmation of a credible witness, or [] personal knowledge of the undersigned.



SEAL

Gail P. Hanley
Notary Public

My Commission Expires: 9-28-18