



North Carolina Department of Administration

Pat McCrory, Governor

Bill Daughtridge, Jr., Secretary

June 5, 2014

Ms. Gail Mount
North Carolina Department of Commerce
Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4325

Re: SCH File # 14-E-4600-0454; Application of Innovative Solar 34, LLC for Certificate to construct a 50 MW Solar Photovoltaic Electric Generating Facility in Richmond Co. Docket #SP-3475, Sub 0.

Dear Ms. Mount:

The above referenced environmental impact information has been reviewed through the State Clearinghouse under the provisions of the North Carolina Environmental Policy Act.

Attached to this letter are comments made in the review of this document. Because of the nature of the comments, it has been determined that no further State Clearinghouse review action on your part is needed for compliance with the North Carolina Environmental Policy Act. The attached comments should be taken into consideration in project development.

Sincerely,

A handwritten signature in cursive script that reads "Crystal Best".

Crystal Best
State Environmental Review Clearinghouse

Attachments

cc: Region N

Mailing Address:
1301 Mail Service Center
Raleigh, NC 27699-1301

Telephone: (919)807-2425
Fax (919)733-9571
State Courier #51-01-00
e-mail state.clearinghouse@doa.nc.gov

Location Address:
116 West Jones Street
Raleigh, North Carolina



North Carolina Department of Environment and Natural Resources

Pat McCrory
Governor

John E. Skvarla, III
Secretary

MEMORANDUM

To: Crystal Best
State Clearinghouse

From: Lyn Hardison *Lyn*
Division of Environmental Assistance and Customer Service
Environmental Assistance and Project Review Coordinator

RE: 14-0454
Environmental Review – Application of Innovative Solar 34, LLC for the Certificate to
construct 50 MW Solar Photovoltaic Electric Generating Facility
Richmond County

Date: May 30, 2014

The Department of Environment and Natural Resources has reviewed the proposal for the referenced project. Based on the information provided, several of the agencies have identified permits that may be required. The NC Wildlife Resources Commission has offered some guidance to minimize impacts to the aquatic and terrestrial wildlife resources within the project site area. The comments are attached for the applicant review.

If the applicant has any questions pertaining to NCDENR permitting processes, please suggest to the applicant to contact David Lee, Permit Assistance Coordinator, in the Department's Raleigh Regional Office, (919)791-4200. The proposed project is located within his geographic working territory.

Thank you for the opportunity to respond.

Attachments



◆ North Carolina Wildlife Resources Commission ◆

Gordon Myers, Executive Director

MEMORANDUM

TO: Lyn Hardison
NCDENR Division of Environmental Assistance & Outreach

FROM: Vann F. Stancil *Vann F. Stancil*
Special Project Coordinator
Habitat Conservation Program

DATE: May 28, 2014

SUBJECT: Comments on Innovative Solar 34, LLC Solar Facility in Richmond County;
Project No. 14-0454.

Biologists from the North Carolina Wildlife Resources Commission (NCWRC) have reviewed the proposed project description. Our comments are provided in accordance with certain provisions of the NC Environmental Policy Act (G.S. 113A-1 through 113A-10; 1 NCAC 25) and the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.).

Innovative Solar 34, LLC proposes to construct a 50 MW solar photovoltaic electric generating facility in Richmond County. The facility would be located at the intersection of Derby Road and Currie Road just south of the Montgomery County border. Aerial views of the site location and footprint of the facility shown on maps with the application materials indicate that the land for the project consists of agricultural and forested land. Clearing trees from a site and installing solar panels is expected to displace most wildlife species currently using the site. Maps also indicate a stream bisecting the property. Solar facilities should be sited to avoid impacts to streams, wetlands, and their buffers as well as habitat for listed species. If any wetlands are present at the site, they should be delineated and the solar arrays arranged to avoid wetland impacts. Currently the NCWRC does not anticipate significant impacts to wildlife and fisheries resources provided there are no impacts to streams or wetlands at the site.

The solar facility will need to connect to existing utility lines. Impacts to wildlife habitat will be minimized by connecting to existing utility lines along pathways that do not contain quality wildlife habitat, such as along cleared or agricultural land.

NCWRC recommends that 50 foot undisturbed, native forested buffers be established or maintained along each side of intermittent streams and along wetlands. For perennial streams, 100 foot buffers should be established or maintained. Forested riparian buffers provide habitat areas for aquatic and terrestrial wildlife species and travel corridors for terrestrial wildlife. In addition, forested riparian buffers protect water quality by stabilizing stream banks and filtering stormwater runoff.

NCWRC encourages developers of solar facilities to use native vegetation wherever practical. Native grasses and wildflowers can provide habitat for birds and other wildlife and require relatively little maintenance. Please feel free to contact me for more details about planting native vegetation.

Thank you for the opportunity to review and comment on this project. Please do not hesitate to contact me at yann.stancil@ncwildlife.org or 919-284-5218 if you have any questions or concerns about these project comments.



North Carolina Department of Environment and Natural Resources
Office of Land and Water Stewardship

Pat McCrory
Governor

Bryan Gossage
Director

John E. Skvarla, III
Secretary

May 29, 2014

MEMORANDUM

TO: Lyn Hardison, NCDENR State Clearinghouse Coordinator

FROM: Allison (Schwarz) Weakley, North Carolina Natural Heritage Program

Allison Weakley

SUBJECT: Environmental Review – Application of Innovative Solar 34, LLC for Certificate to construct a 50 MW Solar Photovoltaic Electric Generating Facility, Richmond County, North Carolina

REFERENCE: Project No. 14-0454

Thank you for the opportunity to provide information from the North Carolina Natural Heritage Program (NCNHP) database for the proposed project referenced above. The Natural Heritage Program database does not have any records of rare species, important natural communities, natural heritage areas, or conservation/managed areas within the proposed project area. However, the database shows several records within close proximity of the proposed project area.

Within one mile of the proposed project area, the NCNHP database has element occurrence records for the following rare species:

SCIENTIFIC NAME	COMMON NAME	ELEMENT OCCURRENCE STATUS*	STATE STATUS*	FEDERAL STATUS*
<i>Chondestes grammacus</i>	Lark Sparrow	Current	SR	---
<i>Etheostoma mariae</i>	Pinewoods Darter	Current	SC	FSC
<i>Lysimachia asperulifolia</i>	Rough-leaf Loosestrife	Historical	E	E
<i>Masticophis flagellum</i>	Coachwhip	Current	SR	---
<i>Picoides borealis</i>	Red-cockaded Woodpecker	Historical	E	E
<i>Pituophis melanoleucus melanoleucus</i>	Northern Pine Snake	Current	SC	FSC
<i>Semotilus lumbee</i>	Sandhills Chub	Current	SC	FSC
<i>Sistrurus miliarius</i>	Pigmy Rattlesnake	Current	SC	---
<i>Trichostema setaceum</i>	Narrowleaf Bluecurls	Current	SR-T	---

* For status definitions, please see the Help document at <http://www.ncnhp.org/web/nhp/database-search>.

In particular, there are records for Lark Sparrow, Rough-leaf Loosestrife, Red-cockaded Woodpecker, Northern Pine Snake, Pinewoods Darter, and Sandhills Chub documented as occurring in close proximity

to the proposed project area. The occurrence records for Coachwhip, Pigmy Rattlesnake, and Narrowleaf Bluecurls have very low accuracy, but these species have also been documented in the area.

The Upper Drowning Creek Swamp Forest and Drowning Creek Aquatic Habitat natural heritage areas are located just east of and downstream of the proposed project area along and within Drowning Creek, respectively. A high-quality example of a Coastal Plain Small Stream Swamp occurs within the Upper Drowning Creek Swamp Forest natural heritage area that borders Drowning Creek, as does Rough-leaf Loosestrife. The Sandhills Chub and Pinewoods Darter occur in the Drowning Creek Aquatic Habitat, and Sandhills Chub has also been documented in tributaries draining to the Naked Creek Aquatic Habitat natural heritage area, just west of the proposed project area. In addition, the NCNHP database shows that the US Fish and Wildlife Service maintains Safe Harbor Agreements for the protection of Red-cockaded Woodpecker just south of the proposed project area and adjacent to the Sandhills Game Lands. The applicant may wish to view the locations of these natural heritages areas and conservation/managed areas by visiting the online map viewer on our website at www.ncnhp.org.

Please note that although the NCNHP database does not show records of natural heritage elements within the proposed project area, it does not necessarily mean that they are not present; it may simply mean that the area has not been surveyed. The use of Natural Heritage Program data should not be substituted for actual field surveys if needed, particularly if the project area contains suitable habitat for rare species.

Feel free to contact me at 919-707-8629 or Allison.Weakley@ncdenr.gov if you have questions or need additional information.

INTERGOVERNMENTAL REVIEW - PROJECT COMMENTS

Project Number: 14-0454 Due Date: 5/28/2014

After review of this project it has been determined that the ENR permit(s) and/or approvals indicated may need to be obtained in order for this project to comply with North Carolina Law. Questions regarding these permits should be addressed to the Regional Office indicated on the reverse of the form. All applications, information and guidelines relative to these plans and permits are available from the same Regional Office.

	PERMITS	SPECIAL APPLICATION PROCEDURES or REQUIREMENTS	Normal Process Time (statutory time limit)
<input type="checkbox"/>	Permit to construct & operate wastewater treatment facilities, sewer system extensions & sewer systems not discharging into state surface waters.	Application 90 days before begin construction or award of construction contracts. On-site inspection. Post-application technical conference usual.	30 days (90 days)
<input type="checkbox"/>	NPDES - permit to discharge into surface water and/or permit to operate and construct wastewater facilities discharging into state surface waters.	Application 180 days before begin activity. On-site inspection. Pre-application conference usual. Additionally, obtain permit to construct wastewater treatment facility-granted after NPDES. Reply time, 30 days after receipt of plans or issue of NPDES permit-whichever is later.	90-120 days (N/A)
<input type="checkbox"/>	Water Use Permit	Pre-application technical conference usually necessary	30 days (N/A)
<input type="checkbox"/>	Well Construction Permit	Complete application must be received and permit issued prior to the installation of a well.	7 days (15 days)
<input type="checkbox"/>	Dredge and Fill Permit	Application copy must be served on each adjacent riparian property owner. On-site inspection. Pre-application conference usual. Filling may require Easement to Fill from N.C. Department of Administration and Federal Dredge and Fill Permit.	55 days (90 days)
<input type="checkbox"/>	Permit to construct & operate Air Pollution Abatement facilities and/or Emission Sources as per 15 A NCAC (2Q.0100 thru 2Q.0300)	Application must be submitted and permit received prior to construction and operation of the source. If a permit is required in an area without local zoning, then there are additional requirements and timelines (2Q.0113).	90 days
<input type="checkbox"/>	Permit to construct & operate Transportation Facility as per 15 A NCAC (2D.0800, 2Q.0601)	Application must be submitted at least 90 days prior to construction or modification of the source.	90 days
<input type="checkbox"/>	Any open burning associated with subject proposal must be in compliance with 15 A NCAC 2D.1900	N/A	60 days (90 days)
<input type="checkbox"/>	Demolition or renovations of structures containing asbestos material must be in compliance with 15 A NCAC 20.1110 (a) (1) which requires notification and removal prior to demolition. Contact Asbestos Control Group 919-707-5950.		
<input type="checkbox"/>	Complex Source Permit required under 15 A NCAC 2D.0800		
<input checked="" type="checkbox"/>	The Sedimentation Pollution Control Act of 1973 must be properly addressed for any land disturbing activity. An erosion & sedimentation control plan will be required if one or more acres to be disturbed. Plan filed with proper Regional Office (Land Quality Section) At least 30 days before beginning activity. A fee of \$65 for the first acre or any part of an acre. An express review option is available with additional fees.		20 days (30 days)
<input type="checkbox"/>	Sedimentation and erosion control must be addressed in accordance with NCDOT's approved program. Particular attention should be given to design and installation of appropriate perimeter sediment trapping devices as well as stable stormwater conveyances and outlets.		(30 days)
<input type="checkbox"/>	Mining Permit	On-site inspection usual. Surety bond filed with ENR Bond amount varies with type mine and number of acres of affected land. Any acre mined greater than one acre must be permitted. The appropriate bond must be received before the permit can be issued.	30 days (60 days)
<input type="checkbox"/>	North Carolina Burning permit	On-site inspection by N.C. Division Forest Resources if permit exceeds 4 days	1 day (N/A)
<input type="checkbox"/>	Special Ground Clearance Burning Permit - 22 counties in coastal N.C. with organic soils	On-site inspection by N.C. Division Forest Resources required "if more than five acres of ground clearing activities are involved. Inspections should be requested at least ten days before actual burn is planned."	1 day (N/A)
<input type="checkbox"/>	Oil Refining Facilities	N/A	90-120 days (N/A)
<input type="checkbox"/>	Dam Safety Permit	If permit required, application 60 days before begin construction. Applicant must hire N.C. qualified engineer to: prepare plans, inspect construction, certify construction is according to ENR approved plans. May also require permit under mosquito control program. And a 404 permit from Corps of Engineers. An inspection of site is necessary to verify Hazard Classification. A minimum fee of \$200.00 must accompany the application. An additional processing fee based on a percentage of the total project cost will be required upon completion.	30 days (60 days)

PERMITS		SPECIAL APPLICATION PROCEDURES or REQUIREMENTS	Normal Process Time (statutory time limit)
<input type="checkbox"/>	Permit to drill exploratory oil or gas well	File surety bond of \$5,000 with BNR running to State of NC conditional that any well opened by drill operator shall, upon abandonment, be plugged according to BNR rules and regulations.	10 days N/A
<input type="checkbox"/>	Geophysical Exploration Permit	Application filed with BNR at least 10 days prior to issue of permit. Application by letter. No standard application form.	10 days N/A
<input type="checkbox"/>	State Lakes Construction Permit	Application fee is charged based on structure size. Must include descriptions & drawings of structure & proof of ownership of riparian property.	15-20 days N/A
<input type="checkbox"/>	401 Water Quality Certification	N/A	60 days (130 days)
<input type="checkbox"/>	CAMA Permit for MAJOR development	\$250.00 fee must accompany application	55 days (150 days)
<input type="checkbox"/>	CAMA Permit for MINOR development	\$50.00 fee must accompany application	22 days (25 days)
<input type="checkbox"/>	Several geodetic monuments are located in or near the project area. If any monument needs to be moved or destroyed, please notify: N.C. Geodetic Survey, Box 27687 Raleigh, NC 27611		
<input type="checkbox"/>	Abandonment of any wells, if required must be in accordance with Title 15A, Subchapter 2C.0100.		
<input checked="" type="checkbox"/>	Notification of the proper regional office is requested if "orphan" underground storage tanks (USTS) are discovered during any excavation operation.		
<input type="checkbox"/>	Compliance with 15A NCAC 2H 1000 (Coastal Stormwater Rules) is required.		45 days (N/A)
<input type="checkbox"/>	Tar Pamico or Neuse Riparian Buffer Rules required.		
<input type="checkbox"/>	Plans and specifications for the construction, expansion, or alteration of a public water system must be approved by the Division of Water Resources/Public Water Supply Section prior to the award of a contract or the initiation of construction as per 15A NCAC 18C .0300 et. seq. Plans and specifications should be submitted to 1634 Mail Service Center, Raleigh, North Carolina 27699-1634. All public water supply systems must comply with state and federal drinking water monitoring requirements. For more information, contact the Public Water Supply Section, (919) 707-9100.		30 days
<input type="checkbox"/>	If existing water lines will be relocated during the construction, plans for the water line relocation must be submitted to the Division of Water Resources/Public Water Supply Section at 1634 Mail Service Center, Raleigh, North Carolina 27699-1634. For more information, contact the Public Water Supply Section, (919) 707-9100.		30 days
* Other comments (attach additional pages as necessary, being certain to cite comment authority)			

REGIONAL OFFICES

Questions regarding these permits should be addressed to the Regional Office marked below.

☐ Asheville Regional Office
2090 US Highway 70
Swannanoa, NC 28778
(828) 296-4500

☐ Mooresville Regional Office
610 East Center Avenue, Suite 301
Mooresville, NC 28115
(704) 663-1699

☐ Wilmington Regional Office
127 Cardinal Drive Extension
Wilmington, NC 28405
(910) 796-7215

☐ Fayetteville Regional Office
225 North Green Street, Suite 714
Fayetteville, NC 28301-5043
(910) 433-3300

☐ Raleigh Regional Office
3800 Barrett Drive, Suite 101
Raleigh, NC 27609
(919) 791-4200

☐ Winston-Salem Regional Office
585 Waughtown Street
Winston-Salem, NC 27107
(336) 771-5000

☐ Washington Regional Office
943 Washington Square Mall
Washington, NC 27889
(252) 946-6481

NORTH CAROLINA STATE CLEARINGHOUSE
DEPARTMENT OF ADMINISTRATION
INTERGOVERNMENTAL REVIEW

Dominique Boyd

COUNTY: RICHMOND

H11: ENERGY RELATED
FACILITIES/ACTIVITIES

STATE NUMBER: 14-E-4600-045
DATE RECEIVED: 05/02/2014
AGENCY RESPONSE: 05/28/2014
REVIEW CLOSED: 06/02/2014

MS CARRIE ATKINSON
CLEARINGHOUSE COORDINATOR
DEPT OF TRANSPORTATION
STATEWIDE PLANNING - MSC #1554
RALEIGH NC

REVIEW DISTRIBUTION

CC&PS - DIV OF EMERGENCY MANAGEMENT
DENR LEGISLATIVE AFFAIRS
DEPT OF AGRICULTURE
DEPT OF CULTURAL RESOURCES
DEPT OF TRANSPORTATION
LUMBER RIVER COG

PROJECT INFORMATION

APPLICANT: N.C. Department of Commerce
TYPE: State Environmental Policy Act
Environmental Review

DESC: Application of Innovative Solar 34, LLC for Certificate to construct a 50 MW Solar Photovoltaic Electric Generating Facility in Richmond Co. Docket #SP-3475, Sub 0. - View document at <http://starwl.ncuc.net/NCUC/portal/ncuc/page/Dockets/portal.aspx>, Type SP-3475 Sub 0 in the Docket Number search line.

Located at the corner of Currie Road and Derby Road, Jackson Springs, NC
The attached project has been submitted to the N. C. State Clearinghouse for intergovernmental review. Please review and submit your response by the above indicated date to 1301 Mail Service Center, Raleigh NC 27699-1301.
If additional review time is needed, please contact this office at (919)807-2425.

AS A RESULT OF THIS REVIEW THE FOLLOWING IS SUBMITTED: ☒ NO COMMENT ☐ COMMENTS ATTACHED

SIGNED BY: *[Signature]*

DATE: 5/28/14



OFFICIAL COPY

JUN 05 2014

NORTH CAROLINA STATE CLEARINGHOUSE
DEPARTMENT OF ADMINISTRATION
INTERGOVERNMENTAL REVIEW

COUNTY: RICHMOND

H11: ENERGY RELATED
FACILITIES/ACTIVITIES

STATE NUMBER: 14-E-4600-045
DATE RECEIVED: 05/02/2014
AGENCY RESPONSE: 05/28/2014
REVIEW CLOSED: 06/02/2014

MS ELIZABETH HEATH
CLEARINGHOUSE COORDINATOR
DEPT OF AGRICULTURE
1001 MSC - AGRICULTURE BLDG
RALEIGH NC

REVIEW DISTRIBUTION

CC&PS - DIV OF EMERGENCY MANAGEMENT
DENR LEGISLATIVE AFFAIRS
DEPT OF AGRICULTURE
DEPT OF CULTURAL RESOURCES
DEPT OF TRANSPORTATION
LUMBER RIVER COG

PROJECT INFORMATION

APPLICANT: N.C. Department of Commerce
TYPE: State Environmental Policy Act
Environmental Review

DESC: Application of Innovative Solar 34, LLC for Certificate to construct a 50 MW Solar Photovoltaic Electric Generating Facility in Richmond Co. Docket #SP-3475, Sub 0. - View document at <http://starwl.ncuc.net/NCUC/portal/ncuc/page/Dockets/portal.aspx>, Type SP-3475 Sub 0 in the Docket Number search line.


Located at the corner of Currie Road and Derby Road, Jackson Springs, NC

The attached project has been submitted to the N. C. State Clearinghouse for intergovernmental review. Please review and submit your response by the above indicated date to 1301 Mail Service Center, Raleigh NC 27699-1301.

If additional review time is needed, please contact this office at (919)807-2425.

AS A RESULT OF THIS REVIEW THE FOLLOWING IS SUBMITTED: ☒ NO COMMENT ☐ COMMENTS ATTACHED

SIGNED BY:


Keith Larick

DATE:

5/19/2014



OFFICIAL COPY

JUN 05 2014

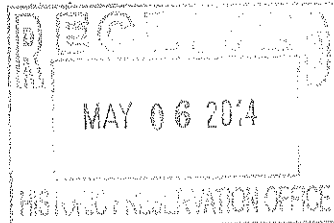
NORTH CAROLINA STATE CLEARINGHOUSE
DEPARTMENT OF ADMINISTRATION
INTERGOVERNMENTAL REVIEW

COUNTY: RICHMOND

H11: ENERGY RELATED
FACILITIES/ACTIVITIES

STATE NUMBER: 14-E-4600-045
DATE RECEIVED: 05/02/2014
AGENCY RESPONSE: 05/28/2014
REVIEW CLOSED: 06/02/2014

MS RENEE GLEDHILL-EARLEY
CLEARINGHOUSE COORDINATOR
DEPT OF CULTURAL RESOURCES
STATE HISTORIC PRESERVATION OFFICE
MSC 4617 - ARCHIVES BUILDING
RALEIGH NC



Cit 14 - 0933

REVIEW DISTRIBUTION

CC&PS - DIV OF EMERGENCY MANAGEMENT
DENR LEGISLATIVE AFFAIRS
DEPT OF AGRICULTURE
DEPT OF CULTURAL RESOURCES
DEPT OF TRANSPORTATION
LUMBER RIVER COG

PROJECT INFORMATION

APPLICANT: N.C. Department of Commerce
TYPE: State Environmental Policy Act
Environmental Review

DESC: Application of Innovative Solar 34, LLC for Certificate to construct a 50 MW Solar Photovoltaic Electric Generating Facility in Richmond Co. Docket #SP-3475, Sub 0. - View document at <http://starwl.ncuc.net/NCUC/portal/ncuc/page/Dockets/portal.aspx>, Type SP-3475 Sub 0 in the Docket Number search line.

Located at the corner of Currie Road and Derby Road, Jackson Springs, NC
The attached project has been submitted to the N. C. State Clearinghouse for intergovernmental review. Please review and submit your response by the above indicated date to 1301 Mail Service Center, Raleigh NC 27699-1301.

If additional review time is needed, please contact this office at (919)807-2425.

AS A RESULT OF THIS REVIEW THE FOLLOWING IS SUBMITTED: ☒ NO COMMENT ☐ COMMENTS ATTACHED

SIGNED BY: Renee Gledhill-Earley

DATE: 5.15.14



MAY 07 2014

OFFICIAL COPY

JUN 05 2014

NORTH CAROLINA STATE CLEARINGHOUSE
DEPARTMENT OF ADMINISTRATION
INTERGOVERNMENTAL REVIEW

COUNTY: RICHMOND

H11: ENERGY RELATED
FACILITIES/ACTIVITIES

STATE NUMBER: 14-E-4600-045
DATE RECEIVED: 05/02/2014
AGENCY RESPONSE: 05/28/2014
REVIEW CLOSED: 06/02/2014

MS CAROLYN PENNY
CLEARINGHOUSE COORDINATOR
CC&PS - DIV OF EMERGENCY MANAGEMENT
FLOODPLAIN MANAGEMENT PROGRAM
MSC # 4719
RALEIGH NC

REVIEW DISTRIBUTION

CC&PS - DIV OF EMERGENCY MANAGEMENT
DENR LEGISLATIVE AFFAIRS
DEPT OF AGRICULTURE
DEPT OF CULTURAL RESOURCES
DEPT OF TRANSPORTATION
LUMBER RIVER COG

PROJECT INFORMATION

APPLICANT: N.C. Department of Commerce
TYPE: State Environmental Policy Act
Environmental Review

DESC: Application of Innovative Solar 34, LLC for Certificate to construct a 50 MW Solar Photovoltaic Electric Generating Facility in Richmond Co. Docket #SP-3475, Sub 0. - View document at <http://starwl.ncuc.net/NCUC/portal/ncuc/page/Dockets/portal.aspx>, Type SP-3475 Sub 0 in the Docket Number search line.

Located at the corner of Currie Road and Derby Road, Jackson Springs, NC

The attached project has been submitted to the N. C. State Clearinghouse for intergovernmental review. Please review and submit your response by the above indicated date to 1301 Mail Service Center, Raleigh NC 27699-1301.

If additional review time is needed, please contact this office at (919)807-2425.

AS A RESULT OF THIS REVIEW THE FOLLOWING IS SUBMITTED: ☒ NO COMMENT ☐ COMMENTS ATTACHED

SIGNED BY: *Dan Helling*

DATE: 5/7/14

Not an SFHA.



OFFICIAL COPY

JUN 05 2014