

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: ***Wiley Dike Repair***
2. Name of applicant: ***Sara Kuhn, WDFW***

3. Address and phone number of applicant and contact person: **600 Capitol Way N; Olympia WA 98501 360-819-3886**
4. Date checklist prepared: **June 23, 2021**
5. Agency requesting checklist: **WDFW**
6. Proposed timing or schedule (including phasing, if applicable):
Construct summer of 2022 if all permits obtained in time. Could be constructed in 2023 if permits come in late.
7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.
No, this project is meant to address overtopping and is designed to make the dike resistant to all weather and tidal influences.
8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.
The Wiley setback dike was built in 2009 when 154.5 acres were returned to estuarine wetlands. Surrounding dikes were removed to accommodate this restoration and the Wiley Setback dike was constructed and tied into the remaining dikes, running 5600 linear feet (LF) east to west. Since its original construction, the dike has been subject to overtopping and flooding events. This proposal would raise the elevation of the dike by approximately three feet to address erosion and stability issues that have damaged the dike since its creation.
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.
There are several other nearby WDFW projects: Skagit WLA Wiley Slough Spur Dike Safety Repair, Skagit WLA HQ Boat Launch, and Skagit WLA Repairs Dike & Drainage. Some have overlap in footprint with the Wiley Setback Dike Repair, and some are adjacent (touching). It is a complex mixture of slightly different timelines, funding and priorities.
10. List any government approvals or permits that will be needed for your proposal, if known.
Project will need county permits, HPA, and all federal permits. WDFW is in communication with each agency.
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 project proposes to raise the elevation of the approximately 5600 foot long Wiley Setback Dike by approximately 3 feet so that its new height will be 16.75 feet. The parking lot will be upgraded to comply with ADA standards and address the increased footprint of the dike. Access roads, ramps, and turnarounds will be modified as a part of this process and the tide gate will be retrofitted to allow for future maintenance of the

structure. Additionally, 10,744 square feet of estuarine habitat will be restored due to the repositioning of the dike around the parking lot and the removal of bump-outs at the western and eastern ends of the dike.

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.

Skagit County, see plans. 21957 Wylie Road, Mount Vernon WA 98273. T33N R3E section 25.

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)?

It is very nearly flat, except for the dike itself, where slopes are 1.5:1.

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 project area is entirely Tacoma silt loam (2ht2), except for previously imported materials. Approximately 1,247 cubic yards (CY) will be excavated during construction to ensure structural stability, as the dike footprint will expand. This excavation will occur within the palustrine wetlands on the landward side of the dike in order to avoid impacts to the higher value estuary south of Wiley Dike.

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 project would remove 1,247 CY of material from the wetlands onsite and would place 3,550 CY of fill (primarily in the form of riprap and dike material) within the wetlands. The fill will be locally sourced by the contractor once they are selected for the project.

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

No, the purpose of this project is to address current erosion and overtopping concerns.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)? **The existing conditions on the site include 158,315 SF of impervious surface and the proposed project would increase the impervious surface by 15,342 SF for a total of 173,657 SF impervious areas.**

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

In its current state, the dike is actively eroding due to stability issues created by overtopping. This project is all about stabilizing the dike and surrounding areas by eliminating overtopping of the structure. Standard erosion control BMPs (straw wattles, coir log installation) will be implemented during construction to reduce incidental erosion and sedimentation. Additionally, work will be completed within the dry at low tide to reduce incidental erosion events.

Permanent impacts to the estuarine habitat were minimized to 87 SF avoided and the repositioning of the dike around the parking area will allow for 10,744 SF of estuarine restoration. In order to accommodate these avoidance measures, the palustrine wetlands on the landward side will be impacted due to the increased footprint of the dike.

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. **General equipment emissions will occur.**

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe. **No.**

c. Proposed measures to reduce or control emissions or other impacts to air, if any: **None proposed or needed.**

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.

Yes, Freshwater Slough (a tributary of the Skagit River) and Wiley Slough are present on the estuarine side of the dike, and Wiley Slough flows south through the tidegate along the dike (STA 40+00). On the landward side of the dike, a series of small Category 2 (WLS B, E, G, and J) and 3 (WLS C/D, F, and H) palustrine wetlands are present.

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. See plans.**

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.

We will be removing 389 CY of existing dike fill and riprap from Wetland A below the Puget Sound OHWM in order to restore 10,744 square feet of estuarine habitat, resulting in 6,530 SF of temporary impacts. 21CY/87 SF of fill (riprap) would be permanently placed in Wetland A for dike stabilization around the parking area and tide gate.

On the landward side of the dike, we will be removing 849 CY of native wetland soil from Wetlands B, E, F, and G. At these same locations, we will be adding 3,529 CY of CSBC and fill in order to construct the West Dike Access Ramp (WL B), hammerhead turnaround (WL F), and East Dike Access Ramp (WL G), in addition to the fill slopes necessary to accommodate the increased dike elevation (WLs B, E, and F). The contractor will be responsible for sourcing fill for construction. This work will result in a total of 22,924 SF of permanent impacts to these freshwater wetlands. Impacts to these wetlands and their buffers will be mitigated for through the purchase of credits from an approved mitigation bank.

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

No.

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

Yes, the entirety of the project area is located within the 100-year floodplain Zone A.

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.

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.

No.

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.

None, though the existing vault toilet will be relocated or replaced in a location that allows for the dike to be raised.

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.

Runoff will continue to flow off dike and into surrounding areas at base of dike.

2) Could waste materials enter ground or surface waters? If so, generally describe.
Not once project is constructed. Currently the erosion occurring to the dike is conveying displaced gravels and fill into the surrounding wetlands.

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:
Project goal is to prevent further dike overtopping.

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?

The existing vegetation around the parking lot will be relocated or replaced to result in an equal area post construction.

c. List threatened and endangered species known to be on or near the site. ***No listed plants known to be on or near the site as of May 27, 2021.***

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

This project will result in 1.61 acre of permanent impacts to wetland buffers and an additional 0.37 acre of buffer impacts associated with the conversion from woody vegetation to herbaceous vegetation. All buffer impacts on this project will be mitigated for through the purchase of 0.359 credits from an approved mitigation bank.

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

Reed canary grass (Phalaris arundinacea), Himalayan blackberry (Rubus armeniacus), purple loosestrife (Lythrum salicaria), yellow flag iris (Iris pseudacorus), poison hemlock (conium maculatum), various mustards, thistle, and cat-tail.

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.

Marbled murrelet

Streaked horned lark

Yellow-billed cuckoo

Oregon spotted frog

Monarch butterfly

Bull trout

Chinook salmon

Gray wolf

Southern resident killer whale

Steelhead

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

Yes, the area is part of the Pacific Flyway. Anadromous fish migrate up and down the Skagit River.

- d. Proposed measures to preserve or enhance wildlife, if any: **The project will result in approximately 10,744 square feet of re-established estuarine wetland. Additionally, this setback dike is the result of a 2009 project that resulted in approximately 156 acres of restored estuarine wetland.**

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

New Zealand mud snail (*Potamopyrgus antipodarum*) has been identified within 10 miles of the site at Carpenter Creek and nutria (*Myocastor coypus*) has been found along Skagit River sloughs north of the project site.

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.

Construction will involve gas and diesel engines primarily. Any need for electrical during construction would likely be provided by portable generators.

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

No effect.

- 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:

None, the project will raise the dike elevation to prevent flooding.

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. **There is a chance for spilling of petroleum products when refueling equipment. However, BMPs will be in place and spill clean up on hand should an issue arise.**

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

No known contamination.

- 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.

No known hazards.

- 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.

Only petroleum.

- 4) Describe special emergency services that might be required.

None anticipated. The dike does provide vehicular access should an issue arise.

- 5) Proposed measures to reduce or control environmental health hazards, if any: **None proposed or needed.**

b. Noise

- 1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)? **No external noise will affect this project.**

- 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. **Elevated noise levels between 80-120 dB(A) associated with the use of heavy machinery will occur during daylight hours throughout construction (expected to take 2-3 months). Traffic will also increase during construction as many dump truck loads of material will be needed to raise the dike. These increases in noise will be a discrete event, and noise levels are expected to return to normal following construction.**

3) Proposed measures to reduce or control noise impacts, if any: **Construction will occur during daylight hours and will return to normal levels upon project completion.**

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. **Adjacent properties are either vacant (habitat) or agricultural or residential. Project will increase protection of agriculture and homes.**

b. 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? **Yes, prior to 2009 some of the area was agricultural in nature.**

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: **No conflicts anticipated. Project is supported by local agriculture.**

c. Describe any structures on the site.

Within the project area, there is one tidegate, one boat ramp, and a recreational vault toilet.

d. Will any structures be demolished? If so, what? **No, but the toilet will be relocated.**

e. What is the current zoning classification of the site? **Open Space of Regional/Statewide Importance (OSRSI).**

f. What is the current comprehensive plan designation of the site? **The site will remain designated as Open Space of Regional/Statewide Importance**

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

h. Has any part of the site been classified as a critical area by the city or county? If so, specify. **Yes, the project area is within a 100-year floodplain zone; therefore the whole project is classified as a critical area by Skagit County. Wiley Slough, the 8 wetlands within the project area, and their buffers are also critical areas.**

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

Proposed project does not change long-term number of people residing or working in the area.

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

None.

k. Proposed measures to avoid or reduce displacement impacts, if any: **No displacement will occur.**

- L. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any: **WDFW has been working with Drainage District 22 to ensure compatibility. Once the project is completed and the Wiley Setback Dike meets the design requirements of the district and the US Army Corps of Engineers, Drainage District 22 will be responsible for future management of the dike.**
- m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any: **Project will result in better protection of existing agriculture, as overtopping and erosion events will cease.**

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

- a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing. **No housing included as part of this project.**
- b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing. **No changes to housing resulting from this project.**
- c. Proposed measures to reduce or control housing impacts, if any: **No impacts to housing.**

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 dike and the concrete retaining wall being installed as a part of the tidegate retrofit will be raised to an elevation of 16.75 feet to match the top of road height. This represents approximately three feet in elevation gain from the existing structure. The principle exterior building materials are concrete and steel for the tidegate retrofit, CSBS for the dike, and riprap and top soil for the dike's side slopes.**
- b. What views in the immediate vicinity would be altered or obstructed? **Resulting dike will be taller, but will not appreciably impact views.**
- b. Proposed measures to reduce or control aesthetic impacts, if any: **No impacts anticipated.**

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

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur? **The majority of the project is earthen. Glare is not anticipated.**
- b. Could light or glare from the finished project be a safety hazard or interfere with views? **Very unlikely.**
- c. What existing off-site sources of light or glare may affect your proposal? **No issues anticipated.**
- d. Proposed measures to reduce or control light and glare impacts, if any: **None proposed or needed.**

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

- a. What designated and informal recreational opportunities are in the immediate vicinity? **The dike is part of the Skagit Wildlife Area. The dike is popular with bird watchers, waterfowl hunters, and people training dogs for waterfowl hunting. The boat ramp is used by fisherman and recreationalists for accessing the lower Skagit River and Puget Sound.**
- b. Would the proposed project displace any existing recreational uses? If so, describe. **No.**
- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any: **Impacts only while construction is occurring to ensure safety.**

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.

No, the Wiley Spur was constructed in 2009. As such the spur is less than 50 years of age.

- 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.

Rader (1998) notes that known wet sites in the region occur near or below the water table and sediment deposits would cover any likely riparian pre contact procurement sites in the area as suggested by Thompson's (1978) habitation model. The current project as designed will should not involve ground disturbance that would impact said possible sites and the Wiley Spur itself is of recent (<50 years of age) construction.

- **Rader, Burt 1998 Cultural Resources Reconnaissance of Deep Water Slough Environmental Enhancement, Section 1135 Project Near Milltown, Skagit County, Washington. Report on file with the Department of Archaeology and Historic Preservation, Olympia, WA.**
- **Thompson, Gail 1978 Prehistoric Settlement Changes in the Southern Northwest Coast: A Functional Approach. University of Washington, Department of Anthropology, Report in Archaeology, No. 5. Seattle, Washington.**

- 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.

Consultation with DAHP and affected tribes under EX-0505, historic maps, GIS data.

- 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.

WDFW inadvertent discovery plan will be in place.

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. **See plans. Site can be accessed from Fir Island Road, and then turn south onto the Wylie Road and drive to the site.**
- 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? **The nearest public transit travels up and down I-5. I-5 is 3.1 miles away.**
- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate? **The project will eliminate approximately 5 parking spots in order to accommodate the realignment of the dike along the southern side of the parking area. This number has been minimized to the maximum extent practicable in order to avoid impacts to the estuary.**
- 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. **Project will use ground transportation exclusively.**
- 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? **Vehicle trips will increase during construction, and then fall back to normal levels once construction is complete.**
- 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. **No.**
- h. Proposed measures to reduce or control transportation impacts, if any: **None proposed or seen as necessary.**

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. **No.**
- 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 _____

- b. 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. **The project would require the relocation of power lines, however the project would not result in the reduction or elimination of any existing utilities.**

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 Sara Kuhn _____

Position and Agency/Organization WDFW _____

Date Submitted: 11/1/2021 _____