

City of Woodinville

2020 NPDES Annual Report

Western Washington Phase II Municipal Stormwater Permit

No. WAR045545

Submitted March 31, 2021

Revised May 25, 2021

Washington Department of Ecology

Electronic Submission Cover Letter



WQWebSubmittal - Submittal Submission Id: 1773388 - 5/25/2021 3:13:41 PM

Company Name	Signer Name	System Name
City of Woodinville	Rick Roberts	WQWebPortal

Attachments:

Document Name Or Description	Document Name
Submitted Copy of Record for City of Woodinville	Copy of Record CityofWoodinville Tuesday May 25 2021
WAR045545_2_03312021083131	2020 Annual Report - 2021 SWMP_2_03312021083131
WAR045545_21_03302021143847	2020 Annual Report - General A_21_03302021143847
WAR045545_4a_03302021143731	2020 Annual Report - Internal _4a_03302021143731
WAR045545_30a_03302021143921	2020 Annual Report - Outfall S_30a_03302021143921
WAR045545_26a_03302021143848	2020 Annual Report - Stewardsh_26a_03302021143848
WAR045545_7_03302021143814	2020 Annual Report - Stormwate_7_03302021143814
WAR045545_81_03302021144152	2020 Annual Report - TMDL Comp_81_03302021144152
WAR045545-2020-ImportedIDDEs_03312021082805	WAR045545-2020-ImportedIDDEs_03312021082805

Attestation Agreed to at Signing:

I certify I personally signed and submitted to the Department of Ecology an Electronic Signature Agreement. I understand that use of my electronic signature account/password to submit this information is equal to my written signature. I have read and followed all the rules of use in my Electronic Signature Agreement. I believe no one but me has had access to my password and other account information.

I further certify: I had the opportunity to review the content or meaning of the submittal before signing it; and to the best of my knowledge and belief, the information submitted is true, accurate, and complete. I intend to submit this information as part of the implementation, oversight, and enforcement of a federal environmental program. I am aware there are significant penalties for submitting false information, including possible fines and imprisonment.

For Ecology Use Only



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DEPARTMENT OF
ECOLOGY
State of Washington

Water Quality Program

Permit Submittal Electronic Certification

Permittee: WOODINVILLE CITY

Permit Number: WAR045545

Site Address: 17301 133RD AVE NE
Woodinville, WA 98072

Submittal Name: MS4 Annual Report Phase II Western

Version: 2

Due Date: 3/31/2021

Questionnaire

Number	Permit Section	Question	Answer
1	S5.A	Attach a copy of any annexations, incorporations or boundary changes resulting in an increase or decrease in the Permittee's geographic area of permit coverage during the reporting period per S9.D.6.	Not Applicable
2	S5.A	Attach updated annual Stormwater Management Program Plan (SWMP Plan). (S5.A.2)	2020 Annual Report - 2021 SWMP_2_03312021083 131
3	S5.A	Implemented an ongoing program to gather, track, and maintain information per S5.A.3, including costs or estimated costs of implementing the SWMP.	Yes
4	S5.A.5.b	Coordinated among departments within the jurisdiction to eliminate barriers to permit compliance. (S5.A.5.b)	Yes
4a	S5.A.5.b	Attach a written description of internal coordination mechanisms. (S5.A.5.b).	2020 Annual Report - Internal _4a_03302021143731
5	S5.C.1.	Have you convened an interdisciplinary team to inform and assist in the development, progress, and influence of the comprehensive stormwater planning program? (S.5.c.1). August 1, 2020	Yes

6	S5.C.1.b.i(a)	List the relevant land use planning efforts that have taken place in your jurisdiction (land use plans that are used to accommodate growth, stormwater management, or transportation). (S5.C.1.b.i(a) and (b) – Required by March 31, 2021 and January 1, 2023)	<ul style="list-style-type: none"> • Comprehensive Stormwater Management Plan • 2015 Regional Stormwater Facility Feasibility Study • 2015 Comprehensive Plan • Capital Improvement Plan • Shoreline Master Program • 2017-2022 Transportation Plan • Parks, Recreation & Open Space (PRO) Plan • Transportation Infrastructure Standards and Specifications (TISS) • Surface Water Management Utility Rate Study
7	S5.C.1.b.i(a)	List of stormwater capital projects (currently in or slated for future design and construction) that resulted from this planning. (S5.C.1.b.i(a) and (b) – Required by March 31, 2021 and January 1, 2023)	2020 Annual Report - Stormwater_7_03302021 143814
8	S5.C.1.b.i(a)	Describe watershed protection measures associated with stormwater management and land use planning actions that resulted from this planning. (S5.C.1.b.i(a) and (b) – Required by March 31, 2021 and January 1, 2023)	<p>The City continued to implement the ongoing water quality monitoring program for Little Bear Creek, Woodin Creek, Cold Creek, and monitor water quality at the stormwater facility outfall to the Sammamish River. The City also completed several capital improvement projects that resulted from this planning.</p> <ul style="list-style-type: none"> • Drainage System Upsize – NE 171st St Urban Parkway Project • Ditch Restoration – Woodinville-Snohomish Rd and along SR 202 (2017) • NE Woodinville Drive Slope Embankment - Slope stability project (2017) • Woodin Creek sediment removal

9	S5.C.1.b.i(a)	Were land acquisitions identified (or are planning ahead for) that are useful for stormwater facilities to accommodate growth or to better serve an existing developed area? (S5.C.1.b.i(a) and (b) – Required by March 31, 2021 and January 1, 2023)	No
10	S5.C.1.b.i(a)	Identified corrective actions, in addition to the minimum requirements of the Municipal Stormwater Permits, to control or treat municipal stormwater discharges that pollute waters of the State (e.g. Limits to impervious cover added to any zoning districts, regional facility planning, minimization of vegetation loss, etc.)? (S5.C.1.b.i(a) and (b) – Required by March 31, 2021 and January 1, 2023)	Yes
10a	S5.C.1.b.i(a)	If yes, briefly describe and list relevant plan or code sections, if applicable.	<ul style="list-style-type: none"> • WMC Chapter 21.50 Development Standards – Tree Protection. The intent of this chapter is to encourage tree retention by establishing a minimum tree density for residential zones to achieve an overall healthy tree canopy cover of 40 percent citywide over time. • 2015 Regional Stormwater Facility Feasibility Study Section 3 – Water Quality Treatment. This plan section describes regional facility planning to treat stormwater discharges draining to Woodin Creek and the Sammamish River.
11	S5.C.1.b.i(a)	Updates to goals and policies related to investment in stormwater management facilities/BMPs? (yes/no) (S5.C.1.b.i(a) and (b) – Required by March 31, 2021 and January 1, 2023)	Yes

11a	S5.C.1.b.i(a)	If yes, briefly describe.	<p>The Comprehensive Plan's goals and subsequent policies were updated to encourage low-impact stormwater management methods. New zoning regulations were set in place in 2010 to encourage the redevelopment of Woodinville's Central Business District. The City conducted a feasibility study in 2015 to evaluate the effectiveness of investing in a regional stormwater facility to collect, treat, and provide flow control for stormwater runoff from the City's downtown area before reaching the Sammamish River.</p> <p>The City also began soliciting for proposals for a stormwater utility rate study during the 2013-2019 permit term, however the recommendations of the study were not enacted until the current permit term.</p>
12	S5.C.1.b.i(a)	Does the long-range plan identify the location and existing capacity of the stormwater facilities owned or operated by the permittee and show which of those stormwater facilities have unused capacity? (yes/no) (S5.C.1.b.i(a) and (b) – Required by March 31, 2021 and January 1, 2023)	No
12a	S5.C.1.b.i(a)	Do these stormwater facility locations impact where housing, or other types of development, are projected to be located or influence the acquisition of land? (if yes, how?)	No.
12b	S5.C.1.b.i(a)	Does the long-range plan identify a lack of facilities and the potential impacts of existing or new development to those areas and receiving waters?	No
12c	S5.C.1.b.i(a)	Any new proposed locations and capacities of stormwater facilities needed for the timeframe of the plan?	No

13	S5.C.1.b.i(a)	Based on the projected population densities and distribution of growth over the planning period, describe how stormwater runoff impacts are forecasted. Does stormwater management information (including water quality) direct where growth is directed? (S5.C.1.b.i(a) and (b) – Required by March 31, 2021 and January 1, 2023)	Stormwater runoff impacts are forecasted through staff review of Technical Information Report information and analyses from drainage evaluation reviews for development and redevelopment. Projects that are unable to meet water quality and flow control standards are not approved.
15	S5.C.1.c	Continue to design and implement local development-related codes, rules, standards, or other enforceable documents to minimize impervious surfaces, native vegetation loss, and stormwater runoff, where feasible? See S5.C.1.c.i. (Required annually)	Yes
16	S5.C.1.c	From the assessment described in S5.C.1.c.i (a), did you identify any administrative or regulatory barriers to implementation of LID Principles or LID BMPs? (Required annually)	No
20	S5.C.2	Did you choose to adopt one or more elements of a regional program? (S5.C.2)	Yes
20a	S5.C.2	If yes, list the elements, and the regional program.	Promoted STORM Puget Sound Starts Here Month in September 2020 through Engage Woodinville and Facebook page. Participated in the Dumpster Outreach Group and Dumpster Summit to develop a strategy and schedule for the behavior change campaign for commercial property dumpster lids.
21	S5.C.2	Attach a description of general awareness efforts conducted, including your target audiences and subject areas, per S5.C.2.a.i.	2020 Annual Report - General A_21_03302021143847
22	S5.C.2	Conducted an evaluation of the effectiveness of the ongoing behavior change program and documented recommendations as outlined in S.5.C.2.a.ii(b). (Required no later than July 1, 2020)	Yes
24	S5.C.2	Began implementing strategy outlined in S.5.C.2.a.ii(c) (S5.C.2.a.ii(d) – Required by April 1, 2021)	No
26	S5.C.2	Promoted stewardship opportunities (or partnered with others) to encourage resident participation in activities such as those described in S5.C.2.a.iii.	Yes
26a	S5.C.2	Attach a list of stewardship opportunities provided.	2020 Annual Report - Stewardsh_26a_033020 21143848

27	S5.C.3.	Describe in Comments field the opportunities created for the public, including overburdened communities, to participate in the decision-making processes involving the development, implementation, and updates of the Permittee's SWMP and the SMAP. (S5.C.3.a)	City Hall was closed to the public for a majority of the reporting year due to COVID-19 restrictions, limiting in-person opportunities for participation in decision making processes. The City started using Engage Woodinville, a website hosted by Engage HQ that allows for translation of site information to over 100 languages. The SWMP and Annual Report are available to download and there is a survey to provide feedback on the SWMP. City solicits for feedback in the City's newsletter (Woodinville Wire) and on the City website.
28	S5.C.3.	Posted the updated SWMP Plan and latest annual report on your website no later than May 31. (S5.C.3.b)	Yes
28a	S5.C.3.	List the website address in Comments field.	https://www.ci.woodinville.wa.us/information/city_hall/environment and https://engagewoodinville.com/stormwater-management
29	S5.C.4.	Maintained a map of the MS4 including the requirements listed in S5.C.4.a.i-vii?	Yes
30	S5.C.4.	Started mapping outfall size and material in accordance with S5.C.4.b.i? (Required no later than January 1, 2020)	Yes
30a	S5.C.4.	Attach a spreadsheet that lists the known outfalls' size and material(s).	2020 Annual Report - Outfall S_30a_03302021143921
31	S5.C.4.	Completed mapping connections to private storm sewers in accordance with S5.C.4.b.ii? (Required no later than August 1, 2023)	No
32	S5.C.4.	Developed an electronic format for map, with fully described mapping standards in accordance with S5.C.4.c? (Required no later than August 1, 2021)	Yes
33	S5.C.5	Informed public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste? (S5.C.5.b)	Yes

33a	S5.C.5	Actions taken to inform public employees, businesses, and the general public of hazards associated with illicit discharges and improper disposal of waste.	The City provided information through articles about household hazardous materials and pet waste in the City's newsletter, the Woodinville Wire, through Engage Woodinville, to businesses through a mailer, and to public employees through illicit discharge training.
34	S5.C.5	Implemented an ordinance or other regulatory mechanism to effectively prohibit non-stormwater, illicit discharges as described in S5.C.5.c.	Yes
35	S5.C.5	Implemented procedures for conducting illicit discharge investigations in accordance with S5.C.5.d.i.	Yes
35a	S5.C.5	Cite field screening methodology in Comments field.	The City uses various field screening methodologies, including but not limited to; outfall inspections, catch basin inspections, and stormwater BMP inspections. The City also follows the Illicit Connection and Illicit Discharge Field Screening and Source Tracing Guidance Manual prepared by Herrera Environmental Consultants, Inc.
36	S5.C.5	Percentage of MS4 coverage area screened in the reporting year per S5.C.5.d.i. (Required to screen 12% on average each year.)	82
36a	S5.C.5	Cite field screening techniques used to determine percent of MS4 screened.	Outfall inspections.
37	S5.C.5	Percentage of total MS4 screened from permit effective date through the end of the reporting year. (S5.C.5.d.i.)	85
38	S5.C.5	Describe how you publicized a hotline telephone number for public reporting of spills and other illicit discharges in the Comments field. (S5.C.5.d.ii)	The City publicized the Stormwater Pollution and Spill Hotline (425-489-2700) on the City's Environment webpage at https://www.ci.woodinville.wa.us/information/city_hall/environment and the City's Engage Woodinville Stormwater Management page.
39	S5.C.5	Implemented an ongoing illicit discharge training program for all municipal field staff per S5.C.5.d.iii.	Yes

40	S5.C.5	Implemented an ongoing program to characterize, trace, and eliminate illicit discharges into the MS4 per S5.C.5.e.	Yes
41	S5.C.5	Municipal illicit discharge detection staff are trained to conduct illicit discharge detection and elimination activities as described in S5.C.5.f.	Yes
42	S5.C.5	Attach a report with data describing the actions taken to characterize, trace, and eliminate each illicit discharge reported to, or investigated by, the Permittee as described in S5.C.5.g. The submittal must include all of the applicable information and must follow the instructions, timelines, and format described in Appendix 12.	WAR045545-2020-ImportedIDDEs_03312021082805
43	S5.C.6.	Implemented an ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii.	Yes
44	S5.C.6.	Revised ordinance or other enforceable mechanism to effectively address runoff from new development, redevelopment, and construction sites per the requirements of S5.C.6.b.i-iii. (Required no later than June 30, 2022)	Yes
44a	S5.C.6.	Cite code reference in Comments field.	Woodinville Municipal Code Chapter 1.06 Code Enforcement.
45	S5.C.6.	Number of adjustments granted to the minimum requirements in Appendix 1. (S5.C.6.b.i. and Section 5 of Appendix 1)	Not Applicable
46	S5.C.6.	Number of exceptions/variances granted to the minimum requirements in Appendix 1. (S5.C.6.b.i., and Section 6 of Appendix 1)	Not Applicable
47	S5.C.6.	Reviewed Stormwater Site Plans for all proposed development activities that meet the thresholds adopted pursuant to S5.C.6.b.i. (S5.C.6.c.i)	Yes
47a	S5.C.6.	Number of site plans reviewed during the reporting period.	44
48	S5.C.6.	Inspected, prior to clearing and construction, permitted development sites per S5.C.6.c.ii, that have a high potential for sediment transport as determined through plan review based on definitions and requirements in Appendix 7 – Determining Construction Site Sediment Damage Potential?	No
48a	S5.C.6.	If no, inspected, prior to clearing and construction, all construction sites meeting the minimum thresholds (S5.C.6.c.ii)?	Yes
49	S5.C.6.	Inspected permitted development sites during construction to verify proper installation and maintenance of required erosion and sediment controls per S5.C.6.c.iii.	Yes
49a	S5.C.6.	Number of construction sites inspected per S5.C.6.c.iii.	20

49b	S5.C.6.	Inspected stormwater treatment and flow control BMPs/facilities and catch basins in new residential developments every 6 months per S5.C.6.c.iv?	Yes
50	S5.C.6.	Inspected all permitted development sites upon completion of construction and prior to final approval or occupancy to ensure proper installation of permanent stormwater facilities. (S5.C.6.c.v)	Yes
51	S5.C.6.	Verified a maintenance plan is completed and responsibility for maintenance is assigned for projects prior to final approval and occupancy being granted. (S5.C.6.c.v)	Yes
52	S5.C.6.	Number of enforcement actions taken during the reporting period (based on construction phase inspections at new development and redevelopment projects). (S5.C.6.c.ii-iv) (S5.C.7.c.viii)	Not Applicable
53	S5.C.6.	Achieved at least 80% of scheduled construction-related inspections. (S5.C.6.c.vi)	Yes
54	S5.C.6.	Made Ecology's Notice of Intent for Construction Activity and Notice of Intent for Industrial Activity available to representatives of proposed new development and redevelopment? (S5.C.6.d)	Yes
55	S5.C.6.	All staff whose primary job duties are implementing the program to control stormwater runoff from new development, redevelopment, and construction sites including permitting, plan review, construction site inspections, and enforcement are trained to conduct these activities? (S5.C.6.e)	Yes
56	S5.C.7.	Implemented maintenance standards that are as protective, or more protective, of facility function than those specified in the Stormwater Management Manual for Western Washington or a Phase I program approved by Ecology per S5.C.7.a.?	Yes
57	S5.C.7.	Updated maintenance standards specified in Stormwater Management Manual for Western Washington per S5.C.7.a? (Required no later than June 30, 2022)	No
58	S5.C.7.	Applied a maintenance standard for a facility or facilities which do not have maintenance standards specified in the Stormwater Management Manual for Western Washington? If so, note in the Comments field what kinds of facilities are covered by this alternative standard. (S5.C.7.a)	Yes
58a	S5.C.7.	Note what kinds of facilities are covered by this alternative standard. (S5.C.7.a)	The City implements the maintenance standards provided by Contech for Filterra facilities and Stormfilter cartridges.
59	S5.C.7.	Verified that maintenance was performed per the schedule in S5.C.7.a.ii when an inspection identified an exceedance of the maintenance standard.	No

59a	S5.C.7.	Attach documentation of maintenance time frame exceedances that were beyond the Permittee's control.	Not Applicable
60	S5.C.7.	Implemented an ordinance or other enforceable mechanisms to verify long-term operation and maintenance of stormwater treatment and flow control BMPs/facilities regulated by the permittee per (S5.C.7.b.i (a))?	Yes
61	S5.C.7.	Annually inspected stormwater treatment and flow control BMPs/facilities regulated by the Permittee per S5.C.7.b.i(b)	Yes
61a	S5.C.7.	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.7.b.i (b)	Not Applicable
62	S5.C.7.	Achieved at least 80% of scheduled inspections to verify adequate long-term O&M. (S5.C.7.b.ii)	Yes
63	S5.C.7.	Annually inspected all municipally owned or operated permanent stormwater treatment and flow control BMPs/facilities. (S5.C.7.c.i)	Yes
63a	S5.C.7.	Number of known municipally owned or operated stormwater treatment and flow control BMPs/facilities. (S5.C.7.c.i)	150
63b	S5.C.7.	Number of facilities inspected during the reporting period.	147
63c	S5.C.7.	Number of facilities for which maintenance was performed during the reporting period.	25
64	S5.C.7.	If using reduced inspection frequency for the first time during this permit cycle, attach documentation per S5.C.7.c.i.	Not Applicable
65	S5.C.7.	Conducted spot checks and inspections (if necessary) of potentially damaged stormwater facilities after major storms as per S5.C.7.c.ii.	Yes
66	S5.C.7.	Inspected municipally owned or operated catch basins and inlets every two years or used an alternative approach? Cleaned as needed? (S.5.C.7.c.iii)	Yes
66a	S5.C.7.	Number of known catch basins?	2684
66b	S5.C.7.	Number of catch basins inspected during the reporting period?	2633
66c	S5.C.7.	Number of catch basins cleaned during the reporting period?	932
67	S5.C.7.	Attach documentation of alternative catch basin cleaning approach, if used. (S5.C.7.c.iii.(a)-(c))	Not Applicable
68	S5.C.7.	Implemented practices, policies and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. (S5.C.7.d)	Yes
69	S5.C.7.	Documented practices, policies, and procedures to reduce stormwater impacts associated with runoff from all lands owned or maintained by the Permittee, and road maintenance activities under the functional control of the Permittee. (S5.C.7.d – Required by December 31, 2022)	No

70	S5.C.7.	Implemented an ongoing training program for Permittee employees whose primary construction, operations or maintenance job functions may impact stormwater quality. (S5.C.7.e)	Yes
71	S5.C.7.	Implemented a Stormwater Pollution Prevention Plan (SWPPP) for all heavy equipment maintenance or storage yards, and material storage facilities owned or operated by the Permittee in areas subject to this Permit that are not required to have coverage under an NPDES permit that covers stormwater discharges associated with the activity. (S5.C.7.f)	Yes
72	S5.C.7.	Updated, if needed, SWPPPs according to S5.C.7.f no later than December 31, 2022.	No
73	S5.C.8	Adopted ordinance(s), or other enforceable documents, requiring the application of source control BMPs for pollutant generating sources associated with existing land uses and activities per S.5.C.8.b.i. (Required by August 1, 2022)	No
74	S5.C.8	Established an inventory per S5.C.8.b.ii. (Required by August 1, 2022.)	No
75	S5.C.8	Implemented an inspection program S5.C.8.b.iii (Required by January 1, 2023).	No
76	S5.C.8	Implemented a progressive enforcement policy per S5.C.8.b.iv (Required by January 1, 2023).	No
77	S5.C.8	Attach a summary of actions taken to implement the source control program per S5.C.8.b.iii and S5.C.8.b.iv.	Not Applicable
78	S5.C.8	Attach a list of inspections, per S5.C.8.b.iii, organized by the business category, noting the amount of times each business was inspected, and if enforcement actions were taken.	Not Applicable
79	S5.C.8	Implemented an ongoing source control training program per S5.C.8.b.v?	No
80	S7	Complied with the Total Maximum Daily Load (TMDL)-specific requirements identified in Appendix 2. (S7.A)	Yes
81	S7	For TMDLs listed in Appendix 2: Attach a summary of relevant SWMP and Appendix 2 activities to address the applicable TMDL parameter(s). (S7.A)	2020 Annual Report - TMDL Comp_81_0330202114 4152
82	S8	Submitted payment for cost-sharing for Stormwater Action Monitoring (SAM) status and trends monitoring no later than December 1, 2019 (S8.A.1); and no later than August 15 of each subsequent year? (S8.A.2.a.)	Yes
84	S8	Submitted payment for cost-sharing for SAM effectiveness and source identification studies no later than December 1, 2019 (S8.B.1); and no later than August 15 of each subsequent year (S8.B.2.a or S8.B.2.c)?	Yes
86	S8	If conducting stormwater discharge monitoring in accordance with S8.C.1, submitted a QAPP to Ecology no later than February 1, 2020? (S8.C.1.b and Appendix 9)	Not Applicable

87	S8	If conducting stormwater discharge monitoring in accordance with S8.C.1, attach a data and analysis report per S8.C.1. and Appendix 9. (Due annually beginning March 31, 2021.)	Not Applicable
88	G3	Notified Ecology in accordance with G3 of any discharge into or from the Permittees MS4 which could constitute a threat to human health, welfare or the environment. (G3)	Yes
89	G3	Took appropriate action to correct or minimize the threat to human health, welfare, and/or the environment per G3.A.	Yes
90	Compliance with standards	Notified Ecology within 30 days of becoming aware that a discharge from the Permittee's MS4 caused or contributed to a known or likely violation of water quality standards in the receiving water. (S4.F.1)	Not Applicable
91	Compliance with standards	If requested, submitted an Adaptive Management Response report in accordance with S4.F.3.a.	Not Applicable
92	Compliance with standards	Attach a summary of the status of implementation of any actions taken pursuant to S4.F.3 and the status of any monitoring, assessment, or evaluation efforts conducted during the reporting period. (S4.F.3.d)	Not Applicable
93	G20	Notified Ecology of the failure to comply with the permit terms and conditions within 30 days of becoming aware of the non-compliance. (G20)	Yes
94	G20	Number of non-compliance notifications (G20) provided in reporting year. List permit conditions described in non-compliance notification(s) in Comments field.	3
94a	G20	List permit conditions described in non-compliance notification(s).	<ul style="list-style-type: none"> • S5.C.7.b.ii • S5.C.7.c.i • S5.C.5.d

I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Rick Roberts

5/25/2021 3:13:39 PM

Signature

Date