

BENJAMIN J. CAYETANO
GOVERNOR



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SAM CALLEJO
COMPTROLLER

MARY PATRICIA WATERHOUSE
DEPUTY COMPTROLLER

STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
P. O. BOX 119, HONOLULU, HAWAII 96810

LETTER NO. (P) 1805.5

OFFICE OF ENVIRONMENTAL
QUALITY CONTROL

NOV 21 1995

Mr. Gary Gill
Director
Office of Environmental
Quality Control
Central Pacific Plaza
220 South King Street, 4th Floor
Honolulu, Hawaii 96813

Dear Mr. Gill:

Subject: Negative Declaration for
Princess Nahienaena Elementary School
Cafetorium/Multipurpose Room
TMK 4-6-18:por. 13

The Department of Accounting and General Services has received and reviewed only one comment letter (see Attachment) during the 30-day public comment period which began on September 8, 1995. The agency has determined that this project will not have significant environmental effect and has issued a negative declaration. Please publish this notice in the December 8, 1995 OEQC Bulletin.

We have enclosed a completed OEQC Bulletin Publication Form and four copies of the final EA. If there are any questions, please have your staff call Mr. Allen Yamanoha of the Planning Branch at 586-0483.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Gordon Matsuoka".
GORDON MATSUOKA
State Public Works Engineer

AY:jy
Attachments
cc: Project Management Branch w/attachs.

167

1995-12-08-MA-PEA-Princess Nahienaena Elementary School Cafetorium/
Multipurpose Room

DEC 8 1995

FILE COPY

FINAL ENVIRONMENTAL ASSESSMENT
(NEGATIVE DECLARATION)
PRINCESS NAHIENAENA ELEMENTARY SCHOOL
CAFETORIUM/MULTIPURPOSE ROOM
NOVEMBER 17, 1995

- A. PROPOSING AGENCY: Department of Accounting and General Services for the Department of Education.
- B. APPROVING AGENCY: Not applicable.
- C. AGENCY CONSULTED: Department of Education.
- D. GENERAL DESCRIPTION OF THE TECHNICAL, SOCIO-ECONOMIC AND ENVIRONMENTAL CHARACTERISTICS:
1. Technical: This project is to construct a new cafetorium/multipurpose room of approximately 4,000 square feet with serving kitchen and A+ office. The new structure will be constructed of reinforced concrete/masonry. Also included in this project are any site improvements and utility easements that may result from this work.
 2. Socio-Economic:
 - a. The proposed project will not create sufficient work to substantially impact the economy and welfare of the community and State.
 - b. The estimated cost of the project is \$2,435,000.
 - c. Since the project will be constructed within the existing school campus, no land will be removed from the tax base.
 - d. The project will provide the school with a much-needed facility to implement its program in accordance with the Educational Specifications.
 3. Environmental:
 - a. The project will not create any major long-term environmental impacts.
 - b. However, during construction, the air quality may be affected by dust and exhaust emissions and it is anticipated there will be a temporary increase in noise levels.
 - c. These impacts are expected to be minimal since State and Federal regulations need to be met.

E. SUMMARY DESCRIPTION OF THE AFFECTED ENVIRONMENT, INCLUDING SITE MAPS:

1. The site of the proposed project is located on the school campus (TMK 4-6-18:por. 13).
2. No habitat of endangered species, flora or fauna are known to exist at the site.
3. No historical, archaeological or cultural sites are known to exist at the site.
4. The site is not in a Special Management Area.
5. The location map and site plan are as shown on Figures 1 and 2, respectively.

F. IDENTIFICATION AND SUMMARY OF MAJOR IMPACTS AND ALTERNATIVES CONSIDERED:

1. Major Impacts: The proposed project will not:
 - a. Involve an irrevocable commitment to loss or destruction of any natural or cultural resources.
 - b. Curtail the range of beneficial uses of the environment.
 - c. Conflict with the State's long-term environmental policies.
 - d. Substantially affect the economic or social welfare of the community or State.
 - e. Involve substantial secondary impacts, such as population changes or effects on public facilities.
 - f. Involve a substantial degradation of environmental quality.
 - g. Detrimentally affect air or water quality or ambient noise levels.

Final Environmental Assessment
(Negative Declaration)
Princess Nahienaena Elementary School
Cafetorium/Multipurpose Room
Page 3

- h. Be located in any environmentally sensitive area, such as a flood plain, tsunami zone, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters.

2. Alternatives to the Proposed Project: "No action" is not considered to be a viable or desirable alternative.

G. PROPOSED MITIGATION MEASURES: Short-term impacts on air and noise quality during construction will be controlled by application of appropriate pollution and noise control measures.

H. DETERMINATION: On the basis of the above assessment and on our findings, it is concluded that the proposed project will not have a permanently significant adverse impact on the environment (project is located on a developed school site currently used for educational purposes). During construction, historical and/or archaeological sites discovered will be reported to the Department of Land and Natural Resources, State Historic Preservation Division for guidance. It is also noted that background information from the Geographic Information System database (mainly from the City and County of Honolulu) is not currently available for this submittal but will be incorporated in other submittal to the Office of Environmental Quality Control when the information is readily available to the Department of Accounting and General Services.

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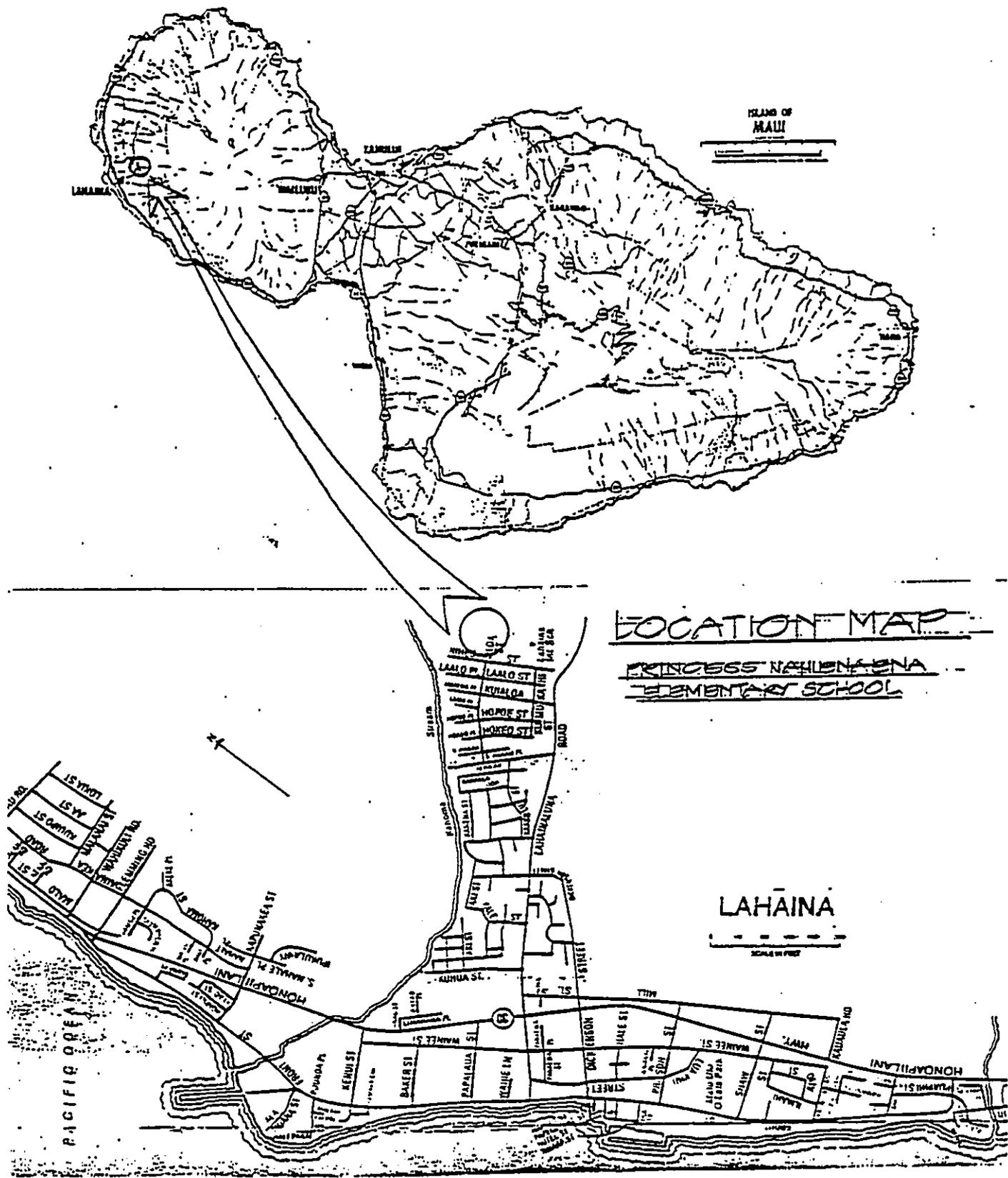
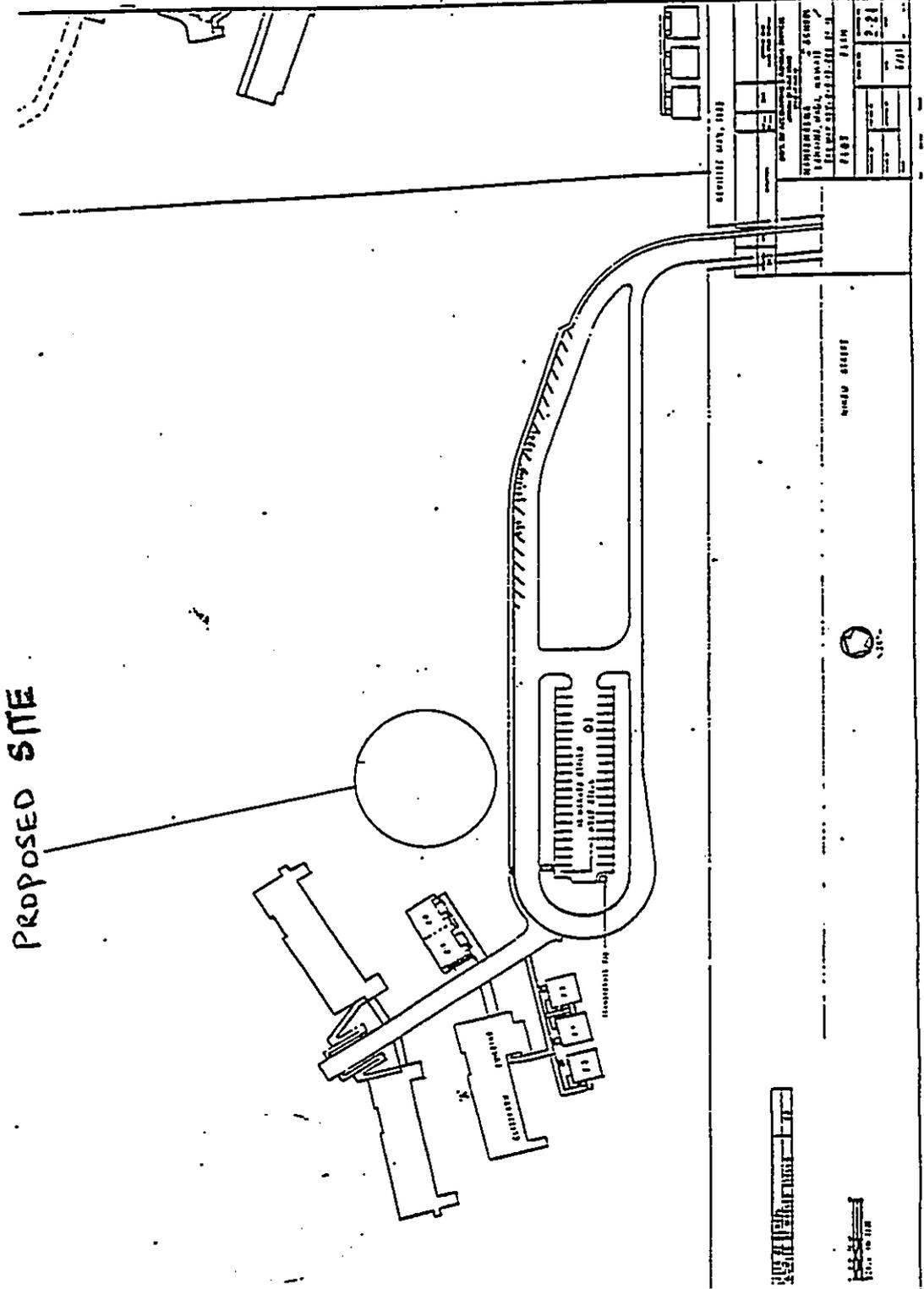


FIGURE 1



NAHIENAENA ELEM. SCHOOL

11-21-95

FIGURE 2

RECEIVED



OCT 4 3 26 PM 1995

DIV. OF PUBLIC WORKS
DAGS

University of Hawai'i at Mānoa

Environmental Center
A Unit of Water Resources Research Center
Crawford 317 • 2550 Campus Road • Honolulu, Hawai'i 96822
Telephone: (808) 956-7361 • Facsimile: (808) 956-3980

September 26, 1995

DIVISION OF PUBLIC WORKS EA:0132

TO	INITIALS	FOR YOUR
<u>1</u> State P.W. Eng.	<u>AA</u>	Approval <u> </u>
— P.W. Secy		Sign <u> </u>
— Staff Serv. Br.		Info <u> </u>
<u>2</u> Planning Br.	<u>AA</u>	File <u> </u>
— Proj. Mgmt. Br.		See me <u> </u>
— Design Br.		Comments <u> </u>
— Insa. Br.		Invest & <u> </u>
— Qual. Cont. Eng.		Rept <u> </u>
— Leasing Serv. Br.		<u> </u>

Mr. Allen Yamanoha
Department of Accounting and General Services
1151 Punchbowl Street, Room 430
Honolulu, Hawaii 96813

Dear Mr. Yamanoha:

DRAFT ENVIRONMENTAL ASSESSMENTS

- 1) Maui Waena Intermediate School Six-Classroom Building
Wailuku, Maui
- 2) Princess Nahienaena Elementary School Cafetorium/Multipurpose Room
Lahaina, Maui
- 3) Baldwin High School Gymnasium
Wailuku, Maui
- 4) Lahaina Intermediate School Locker/Shower Facility and Playfield
Lahaina, Maui
- 5) Castle High School Eight-Classroom Building
Kaneohe, Oahu
- 6) Aikahi Elementary School Administration Building, Expand Library and
Renovate Temporary Administration Facility into Two General Classrooms
Kaneohe, Oahu

The Department of Accounting and General Services (DAGS) has submitted six Environmental Assessments for improvements or additions to existing school facilities on Maui and Oahu. The Environmental Center has conducted an in-house review of the referenced documents. In response to the suggestion that the assessed projects might qualify for exemptions under §11-200-8, Hawaii Administrative Rules (HAR), our review focused on the applicability of exemption classes found both in the EIS Rules and in the current exemption list maintained by DAGS. We conclude that although some of the proposed actions appropriately may be assignable to an exempt category, most do not so qualify. Furthermore, the general level of information provided in these assessments is insufficient to ascertain the extent of likely impacts, and the assessments offer no compelling

Mr. Allen Yamanoha
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evidence that the agency's proposed determinations of no significant impact are founded on a reasoned evaluation of the relevant factors.

MAUI WAENA INTERMEDIATE SCHOOL: Six Classroom Building

A) Potentially Applicable Exemption Classes and Agency Actions:

I) §11-200-8 Classes:

- a. (Class 3) - *single, new, small facilities or structures*
 - *total occupant load of ≤ 20 persons*
 - *utilities to serve such structures*
- b. (Class 4) - *Minor alterations in the conditions of land, water, or vegetation.*
- c. (Class 6) - *minor structures accessory to existing facilities*

II) DAGS Actions:

- a. (Class 3) - New permanent classroom buildings not listed.
- b. (Class 4) - *Clearing and grubbing in accordance with Department of Health and county standards.*
- c. (Class 7) - New permanent classroom buildings not listed.

Comment:

The proposed building is large compared with structures referenced in the Rules (*i.e.*, single family residences, 4-unit dwelling structures, commercial facilities housing 20 or fewer persons). Thus, strictly construed, the class 3 exemption does not apply.

The Class 4 exemption as defined in the EIS Rules is strictly comparative, relying on the interpretation of "minor". Since the exemption is inherently contextual and no comparative examples are provided, no definitive application of this class can be construed in this instance. Under the DAGS Exemption List, however, Class 4 includes more specific actions, including reference to DOH and county standards. Since this list was approved by the EQC, a Class 4 exemption would likely apply for clearing and grading. It is unlikely that construction of a two-story concrete/masonry building would be considered a "minor alteration in the condition of land, water, or vegetation". It should be noted, however, that landform and vegetation modification undertaken for projects which have extensive and significant environmental impacts, *e.g.*, harbor construction, golf courses, convention centers, *etc.*, is a permissible action under DOH and county regulations and ordinances.

Class 6/7 exemptions similarly rely on the definition of "minor." As in the prior discussion, a minor structure in one setting will be major in another. Lacking

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further specificity, strict interpretation of the exemption criteria probably would not allow the proposed classroom building to be exempt from assessment.

Taking a more liberal view, the exemption screen tries to identify actions which *will probably have minimal or no significant effect* (§343-6(a)(7), HRS). The interpretation of what is a minimal effect is central to the argument, yet these criteria are subjective and discretionary. In the context of educational facilities, size *per se* is less important than capacity or intended use, particularly in relation to what presently exists and what likely secondary impacts the increased size and use will engender. The more focal question concerns the nature of the existing environment.

B) Assessment Critique ([brackets refer to EA sections])

[D.2.a,b.; F.1.d.] What amount and/or type of work substantially affects the economy and the welfare of different communities? Some departmental guidelines would be helpful, particularly with regard to defining community characteristics sensitive to infusion of large blocks of state funds (e.g., socio-economic indicators, other planned or ongoing projects, etc.)

[F.1.e.] The assessment lacks any description of the existing natural or human environment at a level which would permit evaluation of claims that the project will not have substantial secondary impacts. Public reviewers are asked to accept the word of the agency without being provided any means of verifying the agency's claim.

[H.] Nowhere, either in Chapter 343 or in the EIS Rules, is there any reference to significance being conferred only to adverse impacts. An environmental impact is defined as "an effect of any kind, whether immediate or delayed, on any component of the environment" (§11-200-2, HAR). Furthermore, in defining content requirements of a draft EIS, §11-200-17(b)(2) specifically requires discussion of "[s]ignificant *beneficial* and adverse impacts (emphasis added).

PRINCESS NAHIENAENA ELEMENTARY SCHOOL: Cafetorium/Multipurpose Room

A) Potentially Applicable Exemption Classes and Agency Actions

I) §11-200-8 Classes:

- a. (Class 3) - *single, new, small facilities or structures*
 - *total occupant load of ≤ 20 persons*
 - *utilities to serve such structures*
- b. (Class 4) - *Minor alterations in the conditions of land, water, or vegetation.*
- c. (Class 6) - *minor structures accessory to existing facilities*

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II) DAGS Actions:

- a. (Class 3) - New cafetorium/multipurpose structures not listed.
- b. (Class 4) - *Clearing and grubbing in accordance with Department of Health and county standards.*
- c. (Class 7) - New cafetorium/multipurpose structures not listed.

Comment:

See comments under Item 1.

B) Assessment Critique

See comments under Item 1.

BALDWIN HIGH SCHOOL: Gymnasium

A) Potentially Applicable Exemption Classes and Agency Actions

I) §11-200-8 Classes:

- a. (Class 3) - *single, new, small facilities or structures*
- *total occupant load of ≤ 20 persons*
- *utilities to serve such structures*
- b. (Class 4) - *Minor alterations in the conditions of land, water, or vegetation.*
- c. (Class 6) - *minor structures accessory to existing facilities*

II) DAGS Actions:

- a. (Class 3) - New gymnasium structures not listed.
- b. (Class 4) - *Clearing and grubbing in accordance with Department of Health and county standards.*
- c. (Class 7) - New gymnasium structures not listed.

Comment:

See comments under Item 1.

B) Assessment Critique

See comments under Item 1.

Mr. Allen Yamanoha
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LAHAINA INTERMEDIATE SCHOOL: Locker/Shower Facility and Playfield

A) Potentially Applicable Exemption Classes and Agency Actions

I) §11-200-8 Classes:

- a. (Class 3) - *single, new, small facilities or structures*
 - *total occupant load of ≤ 20 persons*
 - *utilities to serve such structures*
- b. (Class 4) - *Minor alterations in the conditions of land, water, or vegetation.*
- c. (Class 6) - *minor structures accessory to existing facilities*

II) DAGS Classes:

- a. (Class 3) - *Athletic Field. New locker/shower facilities not listed.*
- b. (Class 4) - *Clearing and grubbing in accordance with Department of Health and county standards.*
 - *Landscaping, including laying topsoil; planting trees, shrubs, and ground cover; and relocating or removing trees.*
 - *Installation of sprinkler system to water trees, shrubs, and grass.*
- c. (Class 7) - *New locker/shower facilities is not listed. (However, Bath house is a listed category, which might be interpreted to be a "locker/shower facility".)*

Comment:

Generally, prior comments apply to the proposed new structure (*i.e.*, a strict interpretation of the exemption class 3 would not allow this building to be constructed without a prior assessment.) However, as noted above, the inclusion of "bath houses" as an action in the DAGS exemption list class 7 might be interpreted to extend to the proposed facility, depending on how "bath house" is defined. Should DAGS choose to adopt this interpretation, some definitive rationale would be advisable, given that a 6,300 square foot bath house doesn't really appear consistent with the Rules Category 3 exemption for "single, new, small facilities or structures."

On the other hand, DAGS' s Class 3 lists athletic fields, which would strictly include playfields. Thus, since the DAGS exemption list was approved by the EQC, at least the playfield element of this EA should be exempt.

B) Assessment Critique

See comments under Item 1.

CASTLE HIGH SCHOOL: Eight-Classroom Building

A) Potentially Applicable Exemption Classes and Agency Actions

I) §11-200-8 Classes:

- a. (Class 3) - *single, new, small facilities or structures*
 - *total occupant load of \leq 20 persons*
 - *utilities to serve such structures*
- b. (Class 4) - *Minor alterations in the conditions of land, water, or vegetation.*
- c. (Class 6) - *minor structures accessory to existing facilities*

II) DAGS Actions:

- a. (Class 3) - *New permanent classroom buildings not listed.*
- b. (Class 4) - *Clearing and grubbing in accordance with Department of Health and county standards.*
- c. (Class 7) - *New permanent classroom buildings not listed.*

Comment:

See comments under Item 1.

B) Assessment Critique

See comments under Item 1.

AIKAHI ELEMENTARY SCHOOL: Administration Building, Expand Library and Renovate Temporary Administration Facility into Two General Classrooms

A) Potentially Applicable Exemption Classes and Actions

I) §11-200-8 Classes:

- a. (Class 2) - *Replacement or reconstruction of existing structures and facilities were the new structure will be located generally on the same site and will have substantially the same purpose, capacity, density, height, and dimensions as the structure replaced.*
- b. (Class 3) - *single, new, small facilities or structures*
 - *total occupant load of \leq 20 persons*
 - *utilities to serve such structures*
- c. (Class 4) - *Minor alterations in the conditions of land, water, or vegetation.*
- d. (Class 6) - *minor structures accessory to existing facilities*

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II) DAGS Actions:

- a. (Class 2) - *Replacement or reconstruction of existing school buildings providing the facilities listed in the Department of Education's "Educational Specifications, Policies, and Design Standards for the Public Schools of Hawaii." The types of buildings that may hereunder be replaced or reconstructed include classrooms, administration offices, libraries, cafeteriums, locker/shower rooms, and gymnasiums.*
- b. (Class 3) - New administration buildings not listed.
- c. (Class 4) - *Clearing and grubbing in accordance with Department of Health and county standards.*
- d. (Class 7) - New administration buildings not listed.

Comment:

The size, scope, and intent of this proposed project seem generally consistent with intended categories of exemption under §11-200-8 HAR and under the approved DAGS exemption list. The new administration building would appear to be exempt under §11-200-8(a)(3)(C), assuming that the administrative staff of the elementary school does not exceed twenty persons. The library expansion seems consistent with §11-200-8(a)(7), and the renovation appropriately falls under §11-200-8(a)(2).

B) Assessment Critique

Given that the project seems eligible for exemption under §11-200-8, HAR, an EA is unnecessary. However, as an assessment, this document is deficient in the same regards as those discussed previously. In addition, although referenced in the text, a location map and a site plan were not included in the copy provided for our review.

SUMMARY

Establishment of reasonable exemption criteria must emerge from a consensus as to what constitutes a minimal significance of impact. Some policy guidance would be useful; unfortunately, Hawaii case law is deficient in this area, and the statute is silent, other than in reference to *minimal or no significant effect* {§343-6(a)(7), HRS}. However, Hawaii's EIS system is in many respects modeled on the federal system under NEPA, and there is an abundance of NEPA case law. Although no direct federal analog to school facility enlargements has been addressed in the federal courts, extensive policy guidance exists in the realm of significance determination and agency responsibilities relative to determining significance.

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Generally, courts have adopted a four-part test in litigation over agencies' significance determinations:

1. Did the agency take a "hard look" at the issues?
2. Did the agency identify the relevant areas of concern?
3. Did the agency make a convincing case that the impact was insignificant?
4. Did the agency convincingly establish that proposed mitigations would reduce impacts below a reasonable threshold of significance? (This part applies in cases involving mitigated FONSI's.)

The "hard look" doctrine was articulated by the US Supreme Court in *Citizens to Preserve Overton Park, Inc. v. Volpe* (401 U.S. 402; 1971). In this case, the court's judgement was based on assessment that the agency's decisions were founded on "a reasoned evaluation of the relevant factors". In making that assessment, the Supreme Court demanded that courts make a "thorough, probing, indepth review" of agency action. The standard of review invoked by the courts in consideration of agencies' significance determinations usually is derived from that established by the Administrative Procedures Act (*e.g.*, the 1992 Ninth Circuit Court of Appeals ruling that "when a litigant challenges an agency determination on the grounds that, in essence, allege that the agency's 'expert review...was incomplete, inconclusive, or inaccurate,' the greater degree of deference expressed by the arbitrary and capricious standard is appropriate" (*Greenpeace Action v. Franklin*, 982 F.2d 1342 [9th Cir. 1992]). The courts will not intrude into the realm of agency expertise, nor will they offer opinions of scientific merit. As noted in *County of Suffolk* (562 F.2d 1368 [2nd Cir. 1977]), "in NEPA cases,...a primary function of the court is to insure that the information available to the decision-maker includes an adequate discussion of environmental effects and alternatives"

Notably, federal case law relates primarily to challenges of agency determinations, rather than to exemptions (referred to as "categorical exclusions", or CATEXs) at the federal level.) In their Guidelines, the Council on Environmental Quality (CEQ) defined CATEXs as, "a category of actions which do not individually or cumulatively have a significant effect on the human environment" The CEQ further noted that proposed CATEXs should reflect broadly defined criteria, with noted examples of agency experience. Also, agencies were required to evaluate whether cumulative effects of several small actions remove a particular group from the CATEX class.

It seems likely that, at least individually, many of the proposed actions in these DAGS assessments might qualify for exemptions. However, on the basis of information provided in the documents, no meaningful evaluation is possible. Certainly, there is no compelling evidence that DAGS has taken a "hard look" at these cases. If DAGS has conducted a "reasoned evaluation of the relevant factors", it is not reflected in information presented in the EA.

Mr. Allen Yamanoha
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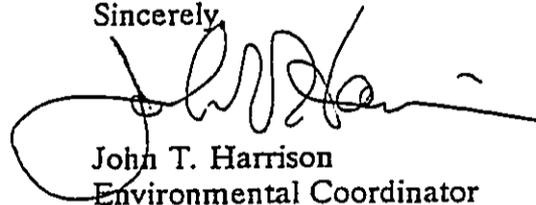
Furthermore, each of the proposed actions is identified as being of insufficient size to "create sufficient work to substantially impact the economy and welfare of the community and State." However, on Maui, the total value of construction proposed amounts to \$13,495,000. While the individual projects may have a limited impact on the local economy, cumulative infusion of construction at this level is bound to be significant. Thus, it is unlikely that the four simultaneous projects on Maui would qualify for an exemption.

Generally, expansion of school facilities on existing school properties, where the capacity increase is less than 10-20% and no extraordinary environmental concerns such as sensitive areas or traffic hazards are involved, reasonably should be exempted. Revisions to the DAGS exemption list should reflect these conditions, noting, pursuant to the CEQ CATEX guidelines, specific examples of agency experience. In this context, it is noteworthy that the Environmental Center's January 11, 1977 review of the DAGS proposal to amend their exemption list repeatedly called for more specific information as to descriptive parameters of proposed actions (*e.g.* type, location, design, size, discharge volume, capacity, physical structure, *etc.*) Similarly, in the Center's November 8, 1984 review of proposed revisions to the EIS Rules, the more general observation was made that,

[t]here have been problems in the past with the inclusion, in proposed exemption lists, of kinds of action defined so broadly that they would include actions that would have significant environmental impacts.

Within the present list, most of the relevant cases involve Class 3 exemptions, and a revised list probably would include appropriate examples of new structures which fall into this category, with appropriate parametric specifications. However, the exemption should not be so broad as to include actions which might incur significant environmental impacts. Thus, new facilities requiring extensive expansion or modification of infrastructure (wastewater treatment, *etc.*), extensively expanded uses, or substantial landscape modifications should not be exempt. Examples of prior actions which DAGS feels are environmentally benign should be carefully evaluated to ensure that similar actions in a different setting or location would similarly be benign.

Sincerely,



John T. Harrison
Environmental Coordinator

cc: OEQC
Roger Fujioka

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(P)1697.5

OCT 17 1995

Mr. John T. Harrison, Coordinator
Environmental Center
University of Hawaii at Manoa
Crawford Hall, Room 317
2550 Campus Road
Honolulu, Hawaii 96822

Dear Mr. Harrison:

Subject: Draft Environmental Assessments for
Various School Projects on Oahu and Maui

The following comments are provided in response to your September 26, 1995 letter on the Environmental Assessment (EA) documents for school projects at Maui Waena Intermediate (six-classroom building); Princess Nahienaena Elementary (cafeteria/multi-purpose room); Baldwin High (gymnasium); Lahaina Intermediate (locker/shower and playfield); Castle High (eight-classroom building); and Aikahi Elementary (administration building, expand library and renovate temporary administration facility into two general classrooms):

1. The subject projects are for new facilities at an existing school. Therefore, potential impacts were previously addressed when the school site was selected, the respective facilities were first planned, and the first increment facilities were constructed.
2. Subsequent school increments on a developed site such as an existing school facility are not expected to have adverse impacts on endangered species, historical, archaeological, and cultural sites because such concerns would have already been identified and mitigation measures completed for the existing schools to currently operate. The entire school site is usually graded by the first or second increment of development. Therefore, no additional site investigations were done for the subject EA documents.
3. However, it is noted that an archaeological survey under the guidance of the Department of Land and Natural Resources, State Historic Preservation Division, will be conducted on the construction site if any historical artifacts are uncovered during the project excavation work.

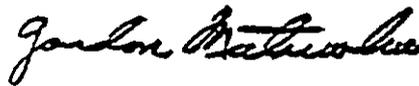
Mr. John T. Harrison
Page 2

Ltr. No. (P)1697.5

4. The project design documents will comply with applicable laws, regulations, codes and ordinances and takes all the EA comments provided into consideration. However, specific details and/or parameters are not available at the time of the EA document publication because the design documents are usually developed after completion of all the EA comments. As an example, mitigation measures for such things as increased surface runoff will be addressed during the design phase of 2 compliance with building code and/or Department of Health requirements. However, actual details on how it is to be done are not available until after completion of the design document.
5. The subject EA documents were submitted to the OEQC for publication to notify the public and other governmental agencies that State projects on existing school sites are forthcoming and to solicit general concerns about the proposed project scope that can be addressed during development of the project design document (not to solicit comments on the project design details or parameters). If the comments are extensive, then an environmental impact statement (EIS) document will be considered for the subject project prior to implementation.

If there are any questions on this matter, please have your staff call Mr. Ralph Morita of the Planning Branch at 586-0486.

Very truly yours,



GORDON MATSUOKA
State Public Works Engineer

AY:jy
cc: Mr. Lester Chuck
OEQC

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END

CERTIFICATION

**I HEREBY CERTIFY THAT THE MICROPHOTOGRAPH APPEARING IN THIS REEL OF
FILM ARE TRUE COPIES OF THE ORIGINAL DOCUMENTS.**

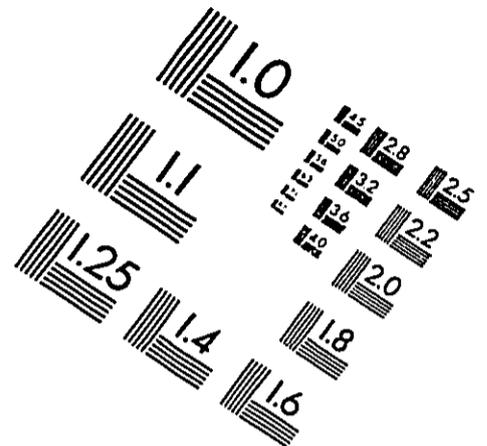
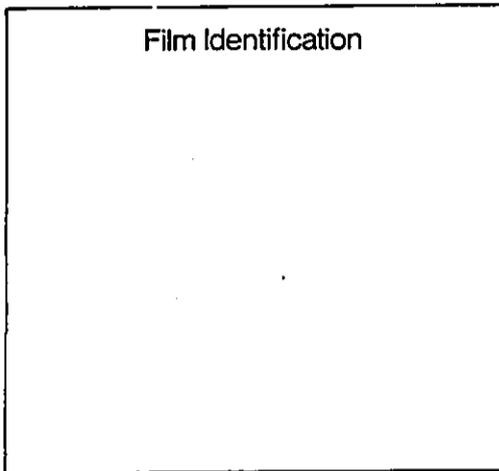
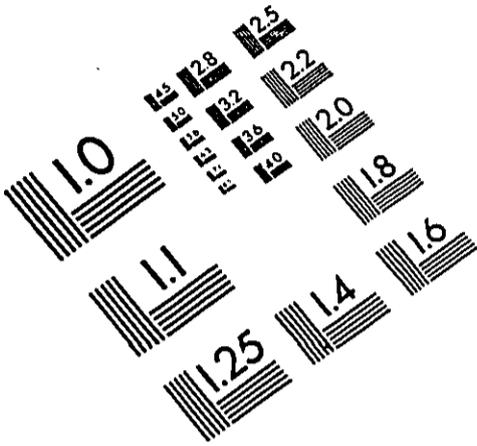
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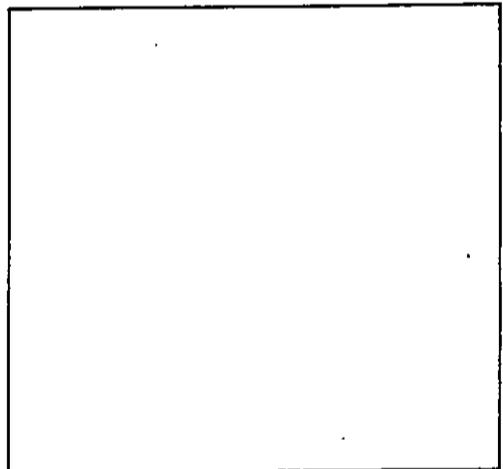
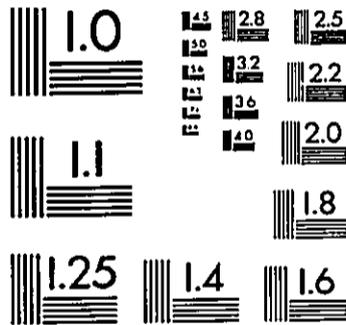
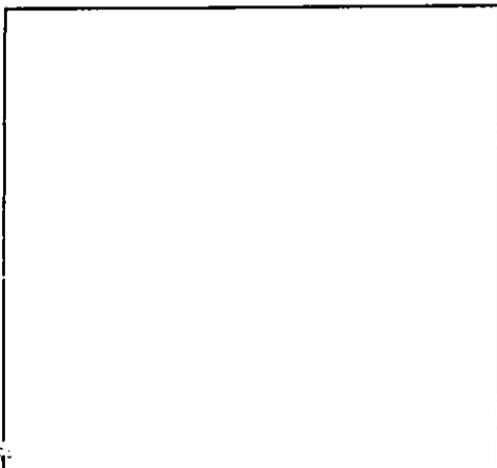
SIGNATURE OF OPERATOR

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PRECISIONSM RESOLUTION TARGETS

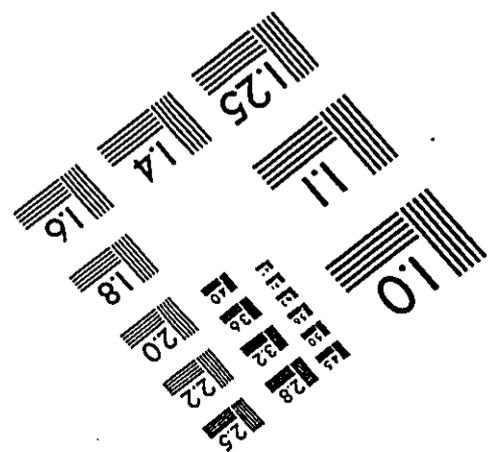
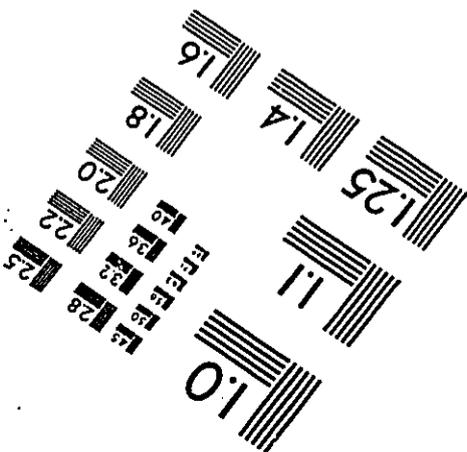


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