August 15, 2022

Mr. Riley Neumann
Hydrogeologist
Wisconsin Department of Natural Resources
2300 N Martin Luther King Dr
Milwaukee WI 53212

Re: Rawson Contractors Yard
11600 W. Forest Home Avenue
Franklin, WI 53132
WDNR BRRTS #02-41-548631

Dear Riley:

LF Green Development, LLC (LF Green) has prepared this Work Plan for additional investigation of the Rawson Contractors site located in Franklin, Wisconsin (the "Site"). This scope of work is based on an evaluation of previous soil and groundwater data, our prior discussions regarding the site, and discussion with Wisconsin Department of Natural Resources (WDNR) Solid Waste personnel.

SITE BACKGROUND

The Site consists of the former Rawson Contractors yard. Rawson Contractors was a sewer construction firm, and the property housed its offices and ancillary buildings. Over time, Rawson Contractors accumulated approximately 2,500 cubic yards of gravel and asphalt shards from various public works projects (sewer and water utility installations and repairs). The material consists of about one to two feet of gravel with asphalt fragments, which was placed east of the former buildings, then graded and compacted to form Rawson Contractors' laydown yard. The area west of the laydown yard contained buildings and employee parking with an asphalt-paved driveway accessing the Site from Forest Home Avenue.

Multiple investigations of the Site have been conducted and were primarily focused on characterization of the gravel material. Investigation sampling locations are depicted in **Figure 1**. Due to the asphalt fragments in the material, polycyclic aromatic hydrocarbons (PAHs) occur in the gravel material but are absent in the underlying native clay (see attached **Table 1**). PAH detects undoubtedly originate from the asphalt component of the fill material. Asphalt is a type of residual petroleum and is known to commonly contain elevated PAH concentrations. Prior investigation indicated that volatile organic compounds (VOCs) were not detected in the gravel material or underlying soils. Naphthalene was detected in only

three of the samples analyzed at concentrations below the groundwater pathway Residual Contaminant Level (RCL).

Groundwater is not impacted based on prior investigations. Groundwater levels were measured between 15 and 18 feet below ground surface on the site. PAHs were detected in samples collected by STS Consultants in 2006 and 2007 were not detected in two consecutive rounds collected by Symbiont in 2008. Similarly, lead was detected above the NR 140 Preventive Action Limit (PAL) in the 2006 and 2007 sampling rounds but was not detected in the 2008 consecutive sampling rounds. The PAHs and lead detected in 2006 and 2007 samples were attributed to sample turbidity, and the 2008 samples were collected using low-flow sampling techniques. The 2006 and 2007 sampling rounds included VOCs. Chloromethane, detected above the PAL, was detected in 2006 samples and was attributed to laboratory contamination from the laboratory's municipal water supply. Chloromethane was not detected in the 2007 samples. Cumulative groundwater analytical data is shown on Symbiont's **Table 2** attached to this work plan.

WDNR concurred that the gravel material is exempt from solid waste rules and can be recycled without further WDNR approval. The property owner plans to remove and transport the material to a materials broker, who will then prepare the material for resale and use as roadbed or parking lot subgrade material as a cost-effective substitute for crushed gravel. Existing concrete floor slabs and asphalt pavements will also be removed for recycling.

Upon completion of these actions, Forest Home Investors intends to develop single-family residential lots on the Site. The proposed scope of work will be completed to ensure that only clean, non-impacted, exempt soils will be managed during grading and future development, and site closure can be obtained without continuing obligations.

PROPOSED SCOPE OF WORK

Monitoring Wells

All monitoring wells have been located and appear to be in good condition. Given the depth to groundwater, which is well below the gravel material, and the historical groundwater analytical data, groundwater sampling is not warranted. Monitoring wells will be maintained intact and will not be abandoned until authorized by WDNR.

Soil Sampling

During removal of the gravel material, LF Green will be present on site to collect soil samples of the underlying naturally occurring clay soils to evaluate the material for indirect indicators of contamination such as odors, visual staining, positive detections on field screening instruments. Any soils exhibiting any of these indirect indicators of contamination will be removed for landfill disposal.

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Soil samples underlying the gravel layer will be analyzed for PAHs. The areal extent of the gravel material encompasses lots 9, 10, 11 and 12 of the development for a total area of approximately 50,000 square feet. Ten samples of native soil in this area have been analyzed for PAHs and 10 were analyzed for benzo(a)pyrene only. An additional 30 samples of native clay will be collected and analyzed for PAHs based on a sampling frequency of one sample per 1,000 square feet. A copy of the preliminary grading plan for the proposed development is included as **Attachment A**.

PAH concentrations in soil will be compared to NR 720 non-industrial RCLs. Total carcinogenic PAHs will be calculated to demonstrate that the underlying soils can be managed during the development with no restrictions and no risk of exposure to future residential occupants.

Cadmium was identified in shallow soil at above its groundwater pathway RCL in 2006. Moraine analyzed additional soil samples from this area and found no detections of cadmium above its groundwater pathway RCL. Test pits and sampling for VOCs and cadmium will be completed in the area of GP-1 and the former diesel UST, and if contamination remains, it will be excavated and disposed at a landfill.

Vapor Assessment

There is little to no risk of vapor intrusion at this site based on past investigation findings; however, a leaking diesel tank was removed from the property in 1991 (BRRTS # 03-41-001465). The WDNR closure letter from 1992 indicates that diesel contaminated soil was excavated and landfill disposed. Samples collected from the excavation indicated that a small amount of contamination (Total Petroleum Hydrocarbons) remained along the south wall of the excavation. Based on these findings, WDNR closed the leaking tank case with no requirements for further investigation or remediation.

Subsequent investigation of the property in 2006 showed no detectable volatile organic compounds (VOCs) in any of the soil or groundwater samples collected, including those collected from a boring and monitoring well installed just east to southeast of the former tank. Given the 1992 remediation results that show little remaining contamination and the 2006 site investigation findings that showed no detectable VOCs, there is little to no potential for remaining VOC contamination from the former tank that could cause a vapor intrusion risk. If no VOCs are found in the test pit samples collected from the area of the former diesel UST, we will conclude that there is no vapor intrusion risk to proposed homes.

Emerging Contaminants

The material consists of gravel with asphalt shards. No evidence of historical operations using and/or handling of per – and polyfluoroalkyl substance (PFAS)-containing compounds or other emerging contaminants (ex. 1,4-dioxane) was documented at the Property. Additionally, no VOC constituents were present at concentrations greater than the laboratory limit of detection in any soil sample historically collected from the Site. Asphalt is not associated with PFAS, dioxanes, or n-nonane. Given this information, no further sampling or assessment of PFAS or other emerging contaminants is warranted.

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Site Investigation Report

A site investigation report will be prepared in accordance with NR 716. The report will include tables, figures, methodology, and all laboratory data. Total carcinogenic PAHs will be calculated for each sample collected to demonstrate that remaining natural soils The report will include all certifications as required by NR 712.

SCHEDULE

Groundwater sampling will be completed during the month of August 2022. Monitoring wells will be protected during removal of the gravel material and will be abandoned upon WDNR review of the sampling results and approval to abandon the wells. Soil sampling will be conducted concurrently or shortly after removal of the gravel material.

Thank you for your assistance with this matter. If you have any questions or comments, please feel free to contact us.

Sincerely,

LF Green Development, LLC

Linda J. Fellenz
President

Katherine M. Juno, PG

I, KATHERINE M. JUNO, hereby certify that I am a hydrogeologist as that term is defined in s. NR 712.03 (1), Wis. Adm. Code, am registered in accordance with the requirements of ch. GHSS 2, Wis. Adm. Code, or licensed in accordance with the requirements of ch. GHSS 3, Wis. Adm. Code, and that, to the best of my knowledge, all of the information contained in this document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 700 to 726, Wis. Adm. Code.

Attachments: Figure: Figure 1 Detailed Site Map
Tables: Table 1 Soil Analytical Results
Table 2 Groundwater Chemistry Data
Attachment A: Preliminary Grading Plan

Copy: Mr. Ken Servi (w/att)

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FIGURE

Figure 1
Detailed Site Map
Rawson Contractors Yard
11600 W Forest Home Ave., Franklin, WI

TABLE

Table 1
Soil Analytical Data
11600 W. Forest Home
Franklin, WI

Sample ID	Collection Date	Depth bgs (feet)	Saturated (S) or Unsaturated (U)	Gravel (G) or Native (N)	1-Methylnaphthalene	2-Methylnaphthalene	Acenaphthene	Acenaphthylene	Anthrancene	**Benzo(a)anthrancene**	***Benzo(a)pyrene***	**Benzo(b)fluoranthene**	Benzo(g,h,i)perylene	**Benzo(k)fluoranthene**	**Chrysene**	**Dibenzo(a,h)anthrancene**	Fluoranthene	Fluorene	**Indeno(1,2,3-cd)pyrene**	Naphthalene	Phenanthrene	Pyrene	Lead	Cadmium	VOCs
Groundwater Pathway RCL					NS	NS	NS	NS	*197000*	NS	*470*	*479*	NS	NS	*145*	NS	*88878*	*14803*	NS	*658*	NS	*54546*	27	0.752	VOCs not detected
Non-Industrial Direct Contact Pathway RCLs					**17600**	**239000**	**3590000**	NS	**17900000**	**1140**	**115**	**1150**	NS	**11500**	**115000**	**115**	**2390000**	**2390000**	**1150**	**5520**	NS	**1790000**	400	71	
Industrial Direct Contact Pathway RCLs					**72700**	**3010000**	**45200000**	NS	**100000000**	**20800**	**2110**	**21100**	NS	**211000**	**2110000**	**2110**	**30100000**	**30100000**	**21100**	**24100**	NS	**22600000**	800	985	
Background Threshold Value					NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	NS	52	1	NS
					Polycyclic Aromatic Hydrocarbons (ug/kg)																			**Metals (mg/kg)**		
B-1/MW-1	09/21/06	1-2	U	G	<24	<46	130	<23	<16	170	32	31	21	11	28	<2.8	43	<11	<1.3	---	18	16	---	---	ND
		4-5	U	N	<24	<46	<33	<23	<16	9.6	28	14	12	7.3	20	<2.8	28	<11	21	---	7.9	38	---	---	ND
B-2/MW-2	09/21/06	1-2	U	G	<23	<43	<31	<22	<15	6.9	39	10	<2.3	4.8	14	<2.6	12	<9.9	<1.3	--	5.7	33	---	---	ND
		4-5	U	N	<23	<44	<31	<22	<15	1	5	9.5	<2.3	3.6	3.3	<2.6	2.6	<10	21	---	<3.2	10	---	---	ND
B-3/MW-3	09/21/06	1-2	U	G	<470	<890	1300	<450	<310	490	***530***	*600*	310	210	*800*	<54	1100	<200	340	---	300	1300	---	---	ND
		4-5	U	N	<25	<47	520	30	<16	8.1	40	18	9.5	5.1	12	<2.8	18	<11	8.5	---	18	30	---	---	ND
B-4	09/21/06	1-2	U	G	<24	<46	<32	<23	<16	66	**190**	42	<2.4	<0.96	24	<2.8	<2.3	<10	30	---	<3.4	64	---	---	ND
		10-11	U	N	<24	<45	<32	<23	<15	4.5	<1.1	<0.47	<2.4	<0.95	<3.4	<2.7	<2.3	<10	<1.3	---	<3.3	<9.1	---	---	ND
B-5	09/21/06	1-2 **	U	G	<23	<44	290	42	<15	11	<1.0	66	<2.3	<0.96	<3.4	<2.7	11	<10	<1.3	---	5.3	19	---	---	ND
		10-11 **	U	N	<460	<870	<620	<440	<300	280	**350**	270	190	120	*450*	<53	560	<200	230	---	350	1000	---	---	ND
	4/14/08 Re-Test	10-12	U	N	<8.9	<8.56	<13.2	<15.5	<4.23	<3.34	<3.00	<3.07	<2.78	<2.67	<3.56	<3.45	<3.67	<4.34	<2.89	---	<12.9	<5.0	---	---	---
	6/23/08 Re-Test	10-11	U	N	<3.72	<3.72	<3.72	<188	<24.8	<4.51	<3.38	<6.76	<2.82	<6.76	<5.64	<11.3	<7.89	<19.2	<15.8	---	<23.7	<10.1	---	---	---
B-6	09/21/06	1-2	U	G	<24	<45	<32	<22	<15	2.1	4.1	3.8	<2.4	4.9	3.4	<2.7	<2.5	<10	<1.3	---	<3.3	<9.0	---	---	ND
		10-11	U	N	<23	<43	<31	<22	<15	<0.91	60	<4.6	<2.3	<0.91	<3.3	<2.6	<2.2	<9.9	<1.3	---	<3.2	<8.8	---	---	ND
	4/14/08 Re-Test	10	U	G	<9.09	<8.75	<13.5	<15.8	<4.32	<3.41	<2.84	<2.78	<2.96	<3.30	<3.64	<5.0	<3.75	<4.43	<2.96	---	<13.2	<5.12	---	---	---
	6/23/08 Re-Test	10-11	U	N	<37.5	<37.5	<37.5	<190	<25	<4.55	<3.41	<6.83	<2.84	<6.83	<5.69	<11.4	<7.96	<19.3	<15.9	---	<23.9	<10.2	---	---	---
GP-1	09/21/06	2-4	U	G		---	---	---	---	---	<6.3	---	---	---	---	---	---	---	---	---	---	---	0.69	*12*	---
		4-6	U	N	---	---	---	---	---	---	5.7	---	---	---	---	---	---	---	---	---	---	---	8	0.69	---
GP-2	09/21/06	0-2	U	G	---	---	---	---	---	---	3.8	---	---	---	---	---	---	---	---	---	---	---	11.5	0.81	---
		2-4	U	N	---	---	---	---	---	---	5.4	---	---	---	---	---	---	---	---	---	---	---	7.4	0.6	---
GP-3	09/21/06	0-2	U	G	---	---	---	---	---	---	35	---	---	---	---	---	---	---	---	---	---	---	12	0.67	---
		2-4	U	N	---	---	---	---	---	---	8.5	---	---	---	---	---	---	---	---	---	---	---	6.5	0.55	---
GP-4	09/21/06	0-2	U	G	---	---	---	---	---	---	***1500***	---	---	---	---	---	---	---	---	---	---	---	---	---	---
		4-6	U	N	---	---	---	---	---	---	51	---	---	---	---	---	---	---	---	---	---	---	---	---	---
GP-5	09/21/06	0-2	U	G	---	---	---	---	---	---	7.5	---	---	---	---	---	---	---	---	---	---	---	---	---	---
		2-4	U	N	---	---	---	---	---	---	4.9	---	---	---	---	---	---	---	---	---	---	---	---	---	---
GP-6	09/21/06	0-2	U	G	---	---	---	---	---	---	7.1	---	---	---	---	---	---	---	---	---	---	---	---	---	---
		4-6	U	N	---	---	---	---	---	---	5	---	---	---	---	---	---	---	---	---	---	---	---	---	---
GP-7	09/21/06	2-4	U	G	---	---	---	---	---	---	<3.6	---	---	---	---	---	---	---	---	---	---	---	---	---	---
		4-6	U	N	---	---	---	---	---	---	<3.4	---	---	---	---	---	---	---	---	---	---	---	---	---	---
GP-8	09/21/06	0-2	U	G	---	---	---	---	---	---	***640***	---	---	---	---	---	---	---	---	---	---	---	---	---	---
		2-4	U	N	---	---	---	---	---	---	<3.5	---	---	---	---	---	---	---	---	---	---	---	---	---	---

Table 1
Soil Analytical Data
11600 W. Forest Home
Franklin, WI

Sample ID	Collection Date	Depth bgs (feet)	Saturated (S) or Unsaturated (U)	Native (N) or Gravel (G)	1-Methylnaphthalene	2-Methylnaphthalene	Acenaphthene	Acenaphthylene	Anthrancene	**Benzo(a)anthrancene**	***Benzo(a)pyrene***	**Benzo(b)fluoranthene**	Benzo(g,h,i)perylene	**Benzo(k)fluoranthene**	**Chrysene**	**Dibenzo(a,h)anthrancene**	Fluoranthene	Fluorene	**Indeno(1,2,3-cd)pyrene**	Naphthalene	Phenanthrene	Pyrene	Lead	Cadmium	VOCs
SB-1	04/14/08	0-1	U	G	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	<1.08	---
		3-6	U	N	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	<1.08	---
SB-2	04/14/08	0-2	U	G	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	<1.13	---
		3-6	U	N	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	<1.12	---
SB-3	04/14/08	0-2	U	G	<8.71	<8.38	<13.0	<15.1	<4.14	<3.27	12.6	22.2	27.4	15	<3.48	<3.37	31.3	<4.25	48.1	ND	<12.6	<4.90	---	<1.05	---
		3-6	U	N	<8.96	<8.63	<13.3	<15.6	<4.26	<3.36	<3.03	<3.03	<2.80	<2.69	<3.25	<4.93	<5.27	<4.37	<3.81	ND	<13.0	<5.04	---	<1.14	---
SB-5	04/14/08	0-2	U	G	<8.37	211	334	<14.6	736	198	**266**	228	478	143	*222*	<3.25	511	<4.40	498	ND	215	372			---
SB-8	04/14/08	0-2	U	G	<9.42	259	458	<16.4	526	217	**289**	271	283	208	*291*	108	619	59.4	558	ND	251	421			---
SB-9	04/14/08	0-2	U	G	<9.36	<9.01	<6.67	<16.3	<4.45	38.5	81.3	67.5	87.3	50.1	63.9	15.1	145	<4.56	136	ND	28.1	75.9			---
SB-10	04/14/08	0-2	U	G	131	2190	3720	<14.1	5980	**1160**	***1150***	*1040*	752	613	*1270*	**336**	6430	988	**1220**	ND	2220	3350			---
SB-11	04/14/08	0-2	U	G	<8.84	250	453	<15.4	<27.4	192	**316**	285	295	227	*308*	**160**	700	<4.31	433	ND	180	373			---
SB-12	04/14/08	0-2	U	G	<9.35	<9.01	<13.9	<16.3	<4.45	11.2	12.1	14.4	<2.93	<3.39	<3.74	<5.15	43.5	<4.56	<3.04	ND	<13.6	<5.27			---
SB-13	04/14/08	0-2	U	G	<8.61	896	2630	<15.0	4600	785	***1050***	*853*	755	548	*954*	**412**	3500	563	***1180***	ND	830	1710			---
SB-14	04/14/08	0-2	U	G	<9.15	82.8	147	<15.9	<4.35	80.9	84.8	96.8	92.8	85.4	104	31.5	355	<4.46	167	ND	128	205			---
SB-15	04/14/08	0-2	U	G	<9.63	387	704	<16.7	2170	333	**368**	312	276	176	*344*	<3.73	1400	125	479	ND	797	795			---
SP-1	03/31/21	0-2	U	G	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	0.24 J	---
SP-2	03/31/21	0-2	U	G	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	<0.15	---
SP-3	03/31/21	0-2	U	G	9.0 J	17.0 J	7.1 J	23.5 J	60.9	263	285	359	220	202	271	52.5	398	9.6 J	184	14.8 J	122	334	---	---	---
SP-4	03/31/21	0-2	U	G	<525	<525	1630 J	640 J	6580	**19300**	***16300***	***21300***	10600	10400	*18300*	**2750 J**	40900	2190 J	***9560***	607 J	22700	35200	---	---	---
SP-5	03/31/21	0-2	U	G	<2.8	<2.8	<2.5	<2.4	<2.4	7.1 J	4.1 J	5.5 J	3.5 J	3.1 J	4.5 J	<2.7	9.1 J	<2.3	<4.0	<1.9	5.4 J	7.9 J	---	---	---
SP-6	03/31/21	0-2	U	G	<3.0	<3.0	<2.6	<2.6	<2.5	6.2 J	4.4 J	5.7 J	4.9 J	3.2 J	<3.8	<2.8	7.2 J	<2.4	<4.2	<2.0	2.7 J	5.3 J	---	---	---
SP-7	03/31/21	0-2	U	G	<5.9	6.1 J	<5.2	13.1 J	25.9 J	123	144	236	148	103	132	29.4 J	218	<4.8	113	5.9 J	59.2	191	---	---	---
SP-8	03/31/21	0-2	U	G	<14.4	<14.5	25.6 J	39.4 J	92.3 J	377	414	567	279	198	382	79.8 J	698	20.1 J	242	<9.6	337	683	---	---	---

RCLs calculated using the EPA Regional Screening Level Web Calculator (PUB-RR-890)
** Lab results indicate samples from 1-2 and 10-11 were mis-labelled. Detected PAHs at B-5 for samples collected on 9/21/06 from 10-11 feet are presumed to be from 1-2 feet as the sample labels were apparently reversed. All values expressed in µg/kg (micrograms per kilogram).
BGS - below ground surface
RCL - Residual Contaminant Level
--- - sample not analyzed for this parameter ND - Not Detected
Italics - Exceeds Groundwater Pathway RCL
Bold - Exceeds Non-Industrial Direct Contact RCL
Bold Underlined - Exceeds Industrial Direct Contact RCL

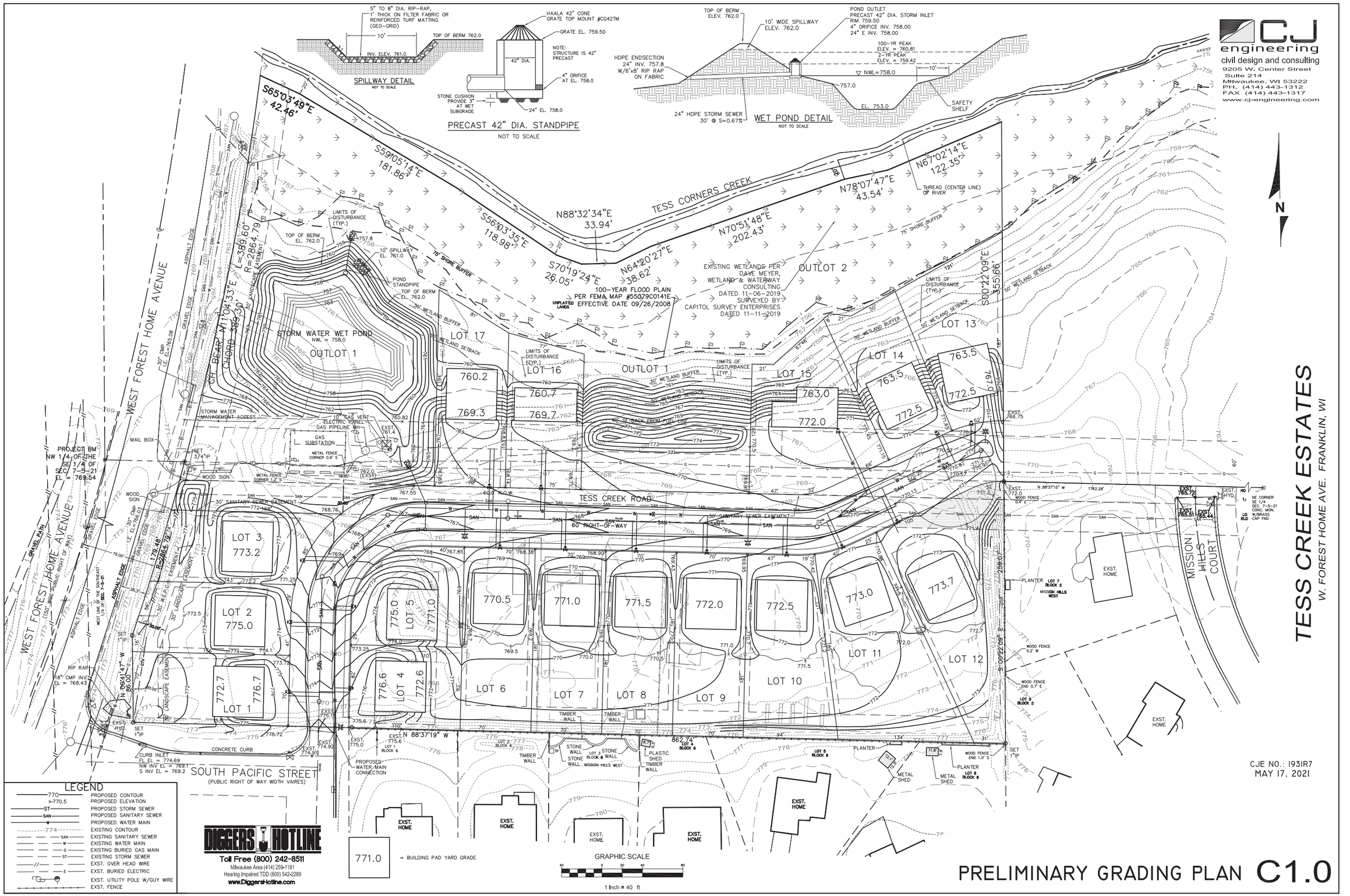
TABLE 2
GROUNDWATER CHEMISTRY DATA
RAWSON CONTRACTOR'S STORAGE YARD SITE
11600 WEST FOREST HOME AVENUE, FRANKLIN, WI
SYMBIONT PROJECT NO. W083491

Constituent Group	Constituent	Wisconsin NR140 Preventative Action Limit	Wisconsin NR140 Enforcement Standard	Well Number, Firm Name that Collected Sample, and Sample Date											
				MW-1				MW-2				MW-3			
				STS		Symbiont		STS		Symbiont		STS		Symbiont	
				9/25/2006	10/29/2007	4/11/2008	7/2/2008	9/25/2006	10/29/2007	4/11/2008	7/2/2008	9/25/2006	10/29/2007	4/11/2008	7/2/2008
		Concentrations (micrograms per liter)													
PAHs	Anthracene	600	3000	**0.074**	<0.041	<0.952	<0.952	<0.024	<0.040	<0.952	<0.952	<0.023	<0.040	<0.952	<0.952
	Benzo(a)pyrene	0.02	0.2	<0.020	<0.020	<0.0952	<0.0952	<0.022	<0.020	<0.0952	<0.0952	<0.021	**1.4**	<0.0952	<0.0952
	Benzo(b)fluoranthene	0.02	0.2	<0.0080	<0.031	<0.0952	<0.0952	<0.0085	<0.030	<0.0952	<0.0952	**0.016**	<0.030	<0.0952	<0.0952
	Benzo(k)fluoranthene	NE	NE	**0.12**	<0.031	<0.133	<0.133	<0.011	<0.030	<0.133	<0.133	<0.010	<0.030	<0.133	<0.133
	Phenanthrene	NE	NE	**0.19**	<0.051	<0.476	<0.476	<0.037	<0.051	<0.476	<0.476	<0.034	<0.051	<0.476	<0.476
	Pyrene	50	250	**0.099**	<0.061	<0.190	<0.190	**0.16**	<0.061	<0.190	<0.190	<0.030	<0.061	<0.190	<0.190
VOCs	Chloromethane	0.3	3	**1.3**	<0.30	ns	ns	<0.30	<0.30	ns	ns	**1.1**	<0.30	ns	ns
Metals	Cadmium	0.5	5	ns	<0.17	<0.001	<0.001	ns	<0.17	<0.001	<0.001	ns	<0.17	<0.001	<0.001
	Lead	1.5	15	ns	**2.3**	<0.005	<0.005	ns	<1.4	<0.005	<0.005	ns	**1.7**	<0.005	<0.005
Groundwater Elevation*		na	na	85.51	nm	90.46	nm	85.44	nm	90.26	nm	85.37	nm	90.05	nm

Note:
MW = Monitoring Well
na = not analyzed
ne = not established
nm = not measured
ns = analyte not sampled
PAH = polycyclic aromatic hydrocarbons
STS = STS Consultants, Ltd.
ug/L = micrograms per liter
VOC = volatile organic compounds
WAC = Wisconsin Adminstrative Code

* Elevations based on site specific datum; W on sewer manhole located in driveway = 100 feet
Bold font highlights concentrations for detected constituents
Underlined values exceed the NR140 WAC Preventative Action Limit
Shaded values exceed the NR140 WAC Enforcement Standard

ATTACHMENT A



PRELIMINARY GRADING PLAN C1.0