Preapproved Routine Impact Assessment Routine Development Projects within the town of Jasper

Parks Canada National Office
IAA 2019

Preapproved Routine Impact Assessments (PRIA) are pre-determined environmental management and mitigation measures for a defined class of routine, repetitive projects or activities with well understood and predictable effects. Approved PRIAs are an acceptable Impact Assessment pathway as they fulfill Parks Canada's obligations under the *Impact Assessment Act* (IAA) as a manager of federal lands.

This PRIA applies to routine projects within the town of Jasper that require demolition, modification, maintenance, repair, replacement or abandonment of existing buildings or other structures and landscaping activities.

The expansion of commercial buildings and parking lots are not included in this PRIA, however, installation of other structures is permitted.

Rationale:

The increased demand for the use of this PRIA in conjunction with additional environmental impacts caused by the Jasper Wildfire Complex has led to revision of the original Routine Development Projects within the town of Jasper PRIA. Additional revisions to this PRIA may be required in the future to address any unforeseen additional environmental impacts as rebuild and restoration proceed.

The impacts of routine development projects in the town of Jasper on environmental and cultural resources are well understood through decades of local environmental assessment practice, the application of industry standards, and through consideration and analysis at the various scales of the Jasper National Park Management Plan and Strategic Environmental Assessment (2022), the Jasper Community Sustainability Plan (2011) and the Model Class Screening for Routine Projects in National Parks Communities (2009), [completed under the previous *Canadian Environmental Assessment Act* (CEAA) prior to the *Impact Assessment Act*]. Accordingly, potential adverse impacts can be appropriately managed through implementation of this PRIA in conjunction with the requirements of the development review process. Additional information is available in the *Parks Canada Directive on Impact Assessment, 2019*.

Definitions:
Buildings: a roofed physical work which includes commercial/institutional buildings, residential houses, sheds, garages, and associated components such as roofs.

Other Structures include service lines, decks, retaining walls, fences, railings, patios, driveways, and parking lots.

Service lines include underground and aboveground service lines for water, sanitary waste, storm water, natural gas, power and communication.

Expansion is an increase in the exterior dimensions or the production capacity of a physical work.

Water body includes a lake, a canal, a reservoir, an ocean, a river and its tributaries and a wetland, up to the annual high-water mark, but does not include sewage or waste treatment lagoon, a mine tailings pond, an artificial irrigation pond, a dugout or a ditch that does not contain fish habitat as defined in subsection 2(1) of the *Fisheries Act*.

High water mark is the usual or average level to which a body of water rises at its highest point and remains for a sufficient time so as to leave a mark on the land. (Fisheries and Oceans Canada, 2015.) Upper Controlled Water Elevation (UCWE) is used as definition of high water mark in managed waterways.

Scope of Application	This PRIA includes routine projects within the town of Jasper that include: • Modification, maintenance, repair, replacement, decommissioning or abandonment of buildings. • Installation, modification, maintenance, repair, replacement, decommissioning or abandonment of other structures. • Landscaping activities • Construction, installation, maintenance, repair, decommissioning or abandonment of fences or railings. • Replacement, rehabilitation, maintenance, repair, decommissioning or abandonment of existing service lines. • Construction or burial of power lines.
Methods of Administration	Where applicable, the PRIA mitigations will become a condition of permits issued by Parks Canada's Jasper Realty and Municipal Services to leaseholders in the town of Jasper. When the PRIA does not apply to a project due to the Scope of Application or Conditions and Exceptions listed, the Jasper Realty and Municipal Services office will refer the project to the Parks Canada Impact Assessment Office for further review.
Conditions and Exceptions	Under the following circumstances, review by the Parks Canada Impact Assessment Office is required to determine if the PRIA is appropriate for the scope and scale of the project, or if additional supplemental mitigations or assessment are required: Buildings, other structures and service lines: • Projects that alter the purpose or function of or results in an expansion of a physical work • Projects that result in increased visitor capacity • Work that affects or involves Federal Heritage Building Review Office (FHBRO) as Cultural Resource Impact Analysis processes may apply;

	• Installation or modification of a wastewater treatment system • Tree removal through the use of heavy equipment (e.g. skidders, harvesters or excavators) • Demolition or construction on sites that are unimpacted by fire and have known or potential contamination. • Work that involves excavation of contaminated soil General: • Project is likely to result in residual adverse effects (that cannot be mitigated) to sensitive natural or cultural resources (e.g., nests, dens and roosts, fish spawning areas, cultural resources, riparian areas, wildlife corridors, rare ecotypes, or areas of management concern); • Projects that cause a change to the water level of a waterbody, the alignment of a watercourse, or the characteristic of a wetland, or involves the release of a deleterious substance as defined in subsection 34(1) of the Fisheries Act into a water body; • Work in the riparian zone of Cabin Creek or Cottonwood Creek (i.e.: within 30 metres of either creek) or below the high-water mark of either creek; • Project involves the placement of temporary or permanent fill in a waterbody or riparian zone; • The project results in **residual** adverse effects on migratory birds or their nests; • The project results in **residual** adverse effects on an individual, a residence or the critical habitat of a listed species at risk under the *Species at Risk Act;* • The project is likely to require an approval[1] under the *Canadian Navigable Waters Act* (s. 5(1)); • The project is likely to require an authorization[2] under the *Fisheries Act* (s.35(1) or 36(3)); • The project involves the removal of or causes damage to cultural resources of heritage value, for example, heritage buildings designated by the Federal Heritage Buildings Review Office, archaeological sites, historical and archaeological objects, or cultural landscapes; • The project involves the removal of or causes damage to paleontological resources; • The project adversely impacts sites of significance to Indigenous peoples or current access and use of areas where hunting, fishing or gathering rights are exercised by Indigenous peoples; • Other circumstances where the PRIA does not address known environmental issues that are associated with the proposed work, or circumstances where the potential environmental impacts of the proposed work are not fully understood.

[1] Check if your project is a Major Works in any Navigable Water or Works in Navigable Waters Listed on the Schedule: https://www.tc.gc.ca/eng/programs-623.html

[2] Check if your projects needs a review: http://www.dfo-mpo.gc.ca/pnw-ppe/reviews-revues/request-review-demande-d-examen-003-eng.html

Approved Geographic Areas of Application	This PRIA only applies to lands within the town of Jasper, located in Jasper National Park. It does not apply to leaseholds or licences of occupation outside of the Jasper townsite (e.g. Lake Edith cottages or outlying commercial accommodations)

Valued Components and Effects Analysis

Soil/Land Resources	• Soil contamination from wastes (e.g., garbage, litter, sewage, fuel, release from leaks and accidental spills, etc.) • Increased disturbance footprint • Soil compaction and rutting • Soil erosion, loss of topsoil and exposure of subsoil • Slope instability, due to increased soil exposure and improper excavation and storage • Change in slopes, landforms and landscape
Air/Noise Quality	• Temporary decreased ambient air quality (e.g., dust, equipment emissions) • Increased ambient noise level
Water Quality	• Reduced water quality due to transportation of debris and contamination • Localized changes to surface water hydrology • Impacts to surface and groundwater quality that may occur due to erosion of bare ground, sedimentation, transportation of debris and contamination from leaks and accidental spills, etc.
Wildlife	• Wildlife habituation/attraction to artificial food sources • Damage to nests/disturbance to nesting birds • Disturbance to wildlife, including species listed under the Species at Risk Act • Impeded/altered wildlife movement • Habitat destruction or alteration • Injury or mortality from project activities
Vegetation	• Introduction of invasive species, or expansion of existing non-native populations • Vegetation loss or damage, disturbance of adjacent natural areas, root exposure and physiological distress • Loss of healthy trees due to damage to roots from physical disturbance or landscaping activities
Visitor Experience and Safety	• Reduced quality of visitor experience due to noise and presence of construction equipment • Reduction in air quality from dust or emissions • Disruptions due to local traffic controls and closures • Adverse visual and aesthetic impacts.
Cultural Resources	• Adverse effects to the heritage value or character-defining elements of a cultural resource or a heritage place • Impacts to archaeological resources (known or potential) from displacement or destruction, resulting in loss of heritage value • Impacts to cultural landscapes, buildings, objects, engineering works

Mitigation Measures

General:

1) Review all applicable mitigations in this document and ensure all required surveys and site-specific plans are reviewed and approved by Parks Canada prior to the commencement of work.
2) Obtain all required Restricted Activity Permits prior to commencement of work.
3) Clearly identify and avoid sensitive environmental features and habitats in the work area and schedule work to avoid critical wildlife life stages. Refer to environmental windows table (Table 1.) in this document and any mitigations that reference sensitive features and habitat and timing windows.
4) A site-specific Spill Response Plan shall be developed prior to work starting.
5) Treated wood is prohibited in certain situations and must be handled, installed, and disposed of according to Parks Canada's current guidelines.

Work Site Conditions/Staging/Laydown:

6) Clearly mark the work site and restricted areas with temporary markers to minimize the disturbance footprint; remove markers when the project is complete.
7) Staging areas, material/equipment drop sites, and parking areas must be identified and within an existing disturbed footprint (e.g., roadways, gravel surface).
8) Use existing roadways, and disturbed areas or other areas as approved by Parks Canada for site access, travel within the site and construction activities.
9) Schedule work to avoid wet, windy and rainy periods or very dry periods that may increase erosion and sedimentation.

Wildlife:

Table 1- Environmental Timing Windows Table (Adapted for Jasper Field Unit)

<table>
<tr><th></th><th>Jan</th><th>Feb</th><th>Mar</th><th>Apr</th><th>May</th><th>Jun</th><th>Jul</th><th>Aug</th><th>Sep</th><th>Oct</th><th>Nov</th><th>Dec</th></tr>
<tr><td>Birds[3]</td><td colspan="4">Reduced risk for harm to birds</td><td colspan="4">AVOID VEGETATION REMOVAL Bird Nesting Period: April 21 – August 13</td><td colspan="4">Reduced risk for harm to birds</td></tr>
<tr><td>Bats[4]</td><td colspan="4">Bat in Hibernacula</td><td colspan="6">AVOID WORK ON BUILT ASSETS WITH MATERNITY ROOSTS, AVOID TREE REMOVAL Bat Maternity Season:(April 15 – September 30)</td><td colspan="2">Bat in Hibernacula</td></tr>
</table>

[3] Dates from Nesting Periods for Migratory Birds in JNP June 2022 \\Jnp-files\groups\CEAA\3_Resources\References\Wildlife, Inverts, SAR\Timing Windows

[4] Dates from Banff Guidelines or bat surveys in forest settings_Sept 2016 G:\CEAA\3_Resources\Species At Risk Resources\Bats

10) If wildlife dens, nests or burrows are found within the project area footprint,contact the Parks Canada Impact Assessment Office for direction.
11) Conduct any clearing of vegetation outside critical wildlife timing windows, including the bird nesting period and bat maternity season (Table 1).
12) Any trench or excavation left open overnight will be covered or fenced to protect people and wildlife. Do not use snow fencing.
13) If active nests, dens or roosts are discovered, stop work and contact the Parks Canada Impact Assessment Office for direction.
14) Never approach or harass wildlife. If wildlife is near the work site, allow the animal to leave the work area on its own.
15) Notify Parks Canada Dispatch (780-852-6155) of any wildlife conflict (e.g., aggressive behaviour, persistent intrusion), distress or mortality.
16) For projects requiring the removal of trees and/or shrubs: The local nesting for breeding migratory birds generally occurs during April 21 – August 13. Destruction of an active nest is prohibited. Plan ahead to complete tree or structure removals and clearing activities outside of that time period.
17) Bats
    a) For building and roof renovations during the breeding season of bats (April 15 to September 30), the presence/absence of bats in the building must be confirmed at least two weeks in advance to work commencing. Results must be documented and provided to Parks Canada. Use of acoustic monitoring equipment is recommended to supplement the initial survey if a building is suspected to be bat habitat. Presence/absence checks must be completed by a qualified individual familiar with bat ecology and bat roosts, and an inspection form is available upon request. If bats are present, Parks Canada will evaluate whether or not the building is used as a maternity roost to determine next steps.
    b) If bat(s) are found during building and roof renovations between October 1st and April 15th, contact Parks Canada. Parks Canada will evaluate whether or not the building is being used for hibernation and determine next steps.
    c) If a bat is found in a building while work is taking place, stop work and allow the bat to exit on its own. Ensure it has access to the outside via open doors or windows. If bats won't exit, or they return or continue to be found, contact Parks Canada to determine next steps.
    d) If dead or injured bats are found, do not touch them. Notify Parks Canada Dispatch at 780-852-6155 for collection.Only a qualified individual should safely collect dead bats to be tested for White-Nose Syndrome (WNS).

Vegetation:

18) Landscaping must follow the guidelines outlined in "Landscaping in the Town of Jasper" (2021).
19) Obtain a Restricted Activity Permit for removal of any non-fruit-bearing tree species.
20) Avoid falling wildlife trees (e.g., snags with cavity nests, large trees with stick nests, trees greater than 25cm DBH).
21) Stumps must be cut no taller than 5cm above ground.
22) When pruning trees, leave the collar or short stub (~5cm) of branch rather than cutting branches flush to the stem. Avoid cutting into the bark of the trunk.

23) Do not park or store materials over the root zone of trees. Keep stockpiles and activity outside of the drip line of trees.
24) A 30-metre vegetated riparian buffer will be maintained around waterbodies.
25) Any required vegetation removal in riparian areas will be kept to a minimum to retain shade, cover, and bank stability for the waterbody.

Invasive Non-Native Vegetation:

26) All equipment must be washed/steam cleaned prior to arrival on the job site to minimize the introduction and spread of contamination, non-native invasive vegetation and soil pathogens. Document proof of cleanliness for all equipment and be prepared to present it to Parks Canada upon request.
27) Import of soil, gravel, and sand from outside Jasper National Park must be approved by Parks Canada prior to import.
28) Topsoil, subsoil, sand or gravel from a construction site can not be used in other sites in the town of Jasper or Jasper National Park unless approved by Parks Canada.
29) Minimize ground disturbance, vegetation removal and bare soil exposure.
30) Cover stockpiled material with tarps or native plantings to reduce erosion potential.
31) Dust abatement is required for soil piles impacted by wind.
32) Stabilize and re-vegetate disturbed areas as soon as possible.
33) Species selected for re-vegetation should be selected from the “Landscaping in the Town of Jasper” (2021) planting lists.
34) Monitor disturbed and re-vegetated areas until native vegetation is growing successfully and weed spread is prevented.

Watercourse Protection:

35) No rock, silt, concrete, grout, asphalt, petroleum product, lumber, vegetation, domestic waste, pesticide, herbicide or any other deleterious substance will be placed, stored or allowed to disperse into any sewer, storm drain or watercourse.
36) Do not pour concrete or pave during steady rain to prevent entry of deleterious materials (e.g. patching and sealing compound) into storm drains or watercourses.

Erosion and Sediment Control (ESC):

37) Work within 30 metres of Cabin Creek or Cottonwood Creek may require site-specific erosion and sediment control (ESC) measures.
38) Select ESC measures that will be most effective for the nature and duration of the project.
39) ESC measures must be installed prior to start of work.
40) Use ESC products made of 100% biodegradable materials (e.g., jute, sisal or coir fibre) when possible. Ensure backing materials are also biodegradable.
41) Use of hay or straw in erosion and sediment control is not permitted.
42) Use ESC products that reduce potential for wildlife entanglement, including net-less erosion control blankets, unreinforced silt fences and netting with a loose-weave wildlife safe design.
43) Manage water flowing onto the work site:
    a) Divert uplands surface runoff away from exposed areas.

b) Do not pump silt-laden water directly into Cottonwood Creek, Cabin Creek, or storm water drains. Pump/divert water to a vegetated area 30 metres from the waterbody, or use a constructed settling basin or other filtration system.
c) Minimize slope length and gradients of disturbed areas.
d) Cover erodible soils.
e) Construct check dams or similar devices in constructed swales and ditches.

44) Limit duration of soil exposure; phase activities whenever possible and restore disturbed areas as soon as possible.
45) Regularly inspect and maintain ESC measures during all phases of the project.
46) Maintain effective ESC measures until stabilization or re-vegetation of disturbed areas is achieved.
47) Remove temporary ESC products when they are no longer required.

Spill Response Plans and Hazardous Material Management:

48) Develop a Spill Response plan that includes responsibilities, potential spill types and volumes, location and type of spill response materials, and procedures for spill cleanup and reporting.
49) Ensure that all on-site workers receive a briefing about the Spill Response Plan and are aware of the location and use of spill kits.
50) Follow all applicable regulations and codes for the management and handling of hazardous waste.
51) Spill containment equipment tailored to the volume and type of fuel/chemicals found on site must be present at all times. A spill contingency response kit including sorbent material and berms to contain 110% of the largest possible spill related to the work must be available on site at each location of potential spills (sites where equipment is working and at refuelling locations).
52) All spills must be contained and cleaned-up as soon as it is possible to safely do so. In the event of a major spill, all other work must stop until the spill has been adequately contained and cleaned up.
53) Notify the ESO of all spills. Large spills (i.e. 100 litres or more) or spills into watercourses must also be immediately reported to Alberta Environment and Parks at 1-800-222-6514 and followed up with a 7-day written report.
54) Testing may be required to ensure delineation and remediation of spills. Test results will be submitted to Parks Canada for review prior to backfill.
55) On-site equipment may be refuelled over an impervious surfaces (roadways or parking lots) or over a berm or drip tray, with spill clean-up materials on hand.
56) Contaminants must be recovered at the source and disposed of according to applicable laws, policies and regulations site. Do not dispose of hazardous materials in the park.
57) Store and use fuels, paints and chemicals more than 30 metres from a waterbody and in such a way as to prevent any substance from entering the ground, storm drains or watercourses.
58) If hazardous waste or potentially contaminated material is uncovered during excavation / construction, work must stop and excavated materials must be secured onsite to prevent contamination of the surrounding environment. Contact the ESO for further direction.
59) Wet, uncured concrete, excess concrete, concrete dust, and washout water must be collected and retained in a drip tray, leak proof container, or berms double lined with polyurethane sheeting and must not come into contact with waterbodies or storm drains.
60) Concrete waste must be recycled or properly disposed of at an approved facility outside of Jasper National Park. Proof of appropriate disposal must be provided to Parks Canada.

61) Concrete mixing activities must take place over tarps and a minimum of 30 metres from a waterbody. Do not dump unused wet concrete on bare ground to harden on site.

Equipment Operation:

62) Use low pressure or rubber tracked equipment or access matting where feasible to minimize soil compaction and ground disturbance.
63) Minimize idling of engines, contingent on operating instructions and temperature considerations.
64) Select equipment appropriate to the nature of work being conducted (e.g., avoid using large scale machinery when hand tools or smaller scale machinery could be used).
65) Heavy equipment operating on paved surfaces should be equipped with street pads; damage to paved surfaces must be restored to original conditions.
66) Equipment must be properly tuned, clean and free of contaminants, in good operating order, free of leaks (e.g., fuel, oil or grease), and fitted with standard air emission control devices and spark arrestors prior to arrival on site.
67) Equipment parked overnight or not in use for more than 30 minutes will be stored on impervious surfaces with drip trays placed underneath.
68) Gas generators must be secured to prevent movement during the operation and set up on an impermeable fuel mat with a berm or within a container that can contain 110% of the volume of fuel in the generator.

Demolition:

69) A Development/Demolition Permit is required.
70) Follow all conditions of project permits and approved guiding documents for sites that require disposal of hazardous debris.
71) Prior to starting demolition, a Hazardous Material Assessment Report detailing hazardous materials present on the site, and the method of disposal must be provided to Parks Canada. This requirement may differ for properties impacted by wildfire.
72) Identify all water, septic, and electrical lines prior to starting work to avoid damage.
73) Service lines and associated infrastructure of no further use on a site must be removed, capped or decommissioned according to the appropriate federal or provincial legislation.
74) If unanticipated contamination or hazardous material is found, cease work immediately and contact Parks Canada.
75) Excavations will only be backfilled with clean, weed-free subsoil.
76) Ensure wastes from demolition activities do not enter waterbodies. Any waste that falls into a waterbody must be immediately retrieved if removal can be done without excessive disturbance of the creek bottom.

Trenching and Excavation:

77) Minimize changes to the ground surface that negatively affect infiltration and runoff characteristics and maintain/re-establish effective surface drainage on completion of the project.
78) Avoid equipment operation on steep or unstable slopes unless absolutely necessary.
79) Ensure excavated material does not damage or bury plant material that is to be retained on the site or in adjacent areas.

80) Topsoil separation is required. Salvage topsoil using a “two lift” method and store topsoil and subsoil separately. Do not mix soils.
81) Stockpiled soils and spoil material must be stored above the top of bank of Cottonwood or Cabin Creeks and sediment will not be allowed to enter the watercourse or stormwater drains.
82) Stockpiled material must not be placed on or near known cultural resources.
83) Reuse excavated material on site.
84) Excavations must be backfilled and compacted as soon as possible. Optimize degree of compaction to soils to minimize erosion and allow for re-vegetation.
85) Under thawed conditions, backfill material will be compacted prior to topsoil replacement; distribute topsoil over the graded backfill.
86) Under frozen ground conditions, material will be sufficiently spread over the excavated site to allow for a settlement under thawed conditions. Additional work may be required if subsidence or soil mixing occurs.

Site Clean-up and Waste Management:

87) All wildlife attractants must be secured in wildlife-proof containers, a secure building or vehicle. Food waste will be kept separate from construction waste and removed daily.
88) The construction site and adjacent areas must be maintained in a tidy condition, free from excess construction waste, debris and garbage.
89) All salvageable, non-combustible and non-hazardous materials will be removed, reused and recycled to the greatest extent possible. Remaining material considered to be waste and demolition debris is to be disposed of at an approved disposal facility.
90) Ensure all waste is stored and handled in compliance with the National Park Garbage Regulations. Burning or burial of waste is not permitted.
91) Waste must be source separated and disposed of as follows:
    a. Sorted materials: including clean wood, glass, metal, concrete and clean fill may be accepted at the Jasper Waste Transfer Station or a licensed landfill site outside the Park and recycled at a licensed recycling facility where possible.
    b. Cardboard (All types): must be recycled at a licensed recycling facility.
    c. Unsorted waste: including drywall, carpets, treated or painted wood (i.e.: Cedar shingles), asphalt, tar paper, tar and gravel shingles and other mixed construction debris must be disposed of at a licensed landfill site outside of the Park.
92) Hazardous waste material, including but not limited to: contaminated soil, fuel tanks, lead paint, asbestos, mercury switches, creosote treated wood, paints and chemicals and burned household material must be classified and disposed of at a licensed landfill site per applicable federal and provincial regulation. Proof of appropriate disposal must be provided to Parks Canada.
93) Contact the Jasper Waste Transfer Station for up to date information on waste that will be accepted. Operating policies and fees are subject to change.
94) All construction materials must be removed from the site on project completion. Burning or burying is not permitted.
95) Regularly service portable sanitary facilities and dispose of waste at a sanitary waste disposal facility. The portable facilities must have sufficient capacity and be managed to ensure waste is not discharged to the environment.

Cultural Resources:

96) If workers observe any potential cultural resources while working, they should STOP WORK in the immediate area, secure the site, and contact Parks Canada to discuss protective measures that might be required.

97) For parcels of land within the town of Jasper that are undeveloped, an archeological review must occur if any surface or subsurface disturbance is proposed (See Appendix 1).

Visitor Experience and Safety:

98) Noise restrictions outlined in the Municipality of Jasper noise bylaw (#108) must be followed.

99) Close and mark the work site and safety hazards with appropriate signage while active construction, repair or maintenance is underway; consider temporary detours or reroutes as appropriate.

100) If closing the area is not possible, maintain a safe working distance between work activities and visitors. If traffic control is required, a flag person should manage traffic through the construction/hazard area.

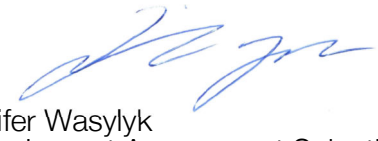
101) Visitor access trails and roads outside the construction area must be free of construction materials, waste, machinery and equipment.

102) The construction site must be secure and safe at all times. All site activities must comply with federal and provincial occupational health and safety legislations.

Supplementary Mitigations:

103) In the application of PRIAs, supplementary mitigations may be required to ensure all potential impacts are mitigated. Site-specific mitigations may be applied by the Realty or Impact Assessment Officer and are included in the Terms and Conditions of permits issued for the Project.

Approvals

Recommended By
 Jennifer Wasylyk Senior Impact Assessment Scientist, Jasper National Park
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 Erin Saunders Municipal and Realty Services Manager, Jasper National Park
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Fehr, Alan Digitally signed by Fehr, Alan DN: C=CA, O=GC, OU=PCA-APC, CN="Fehr, Alan" Reason: I am the author of this document Location: Date: 2024.10.23 10:43:48-06'00' Foxit PDF Editor Version: 13.1.3 Alan Fehr Field Unit Superintendent, Jasper National Park

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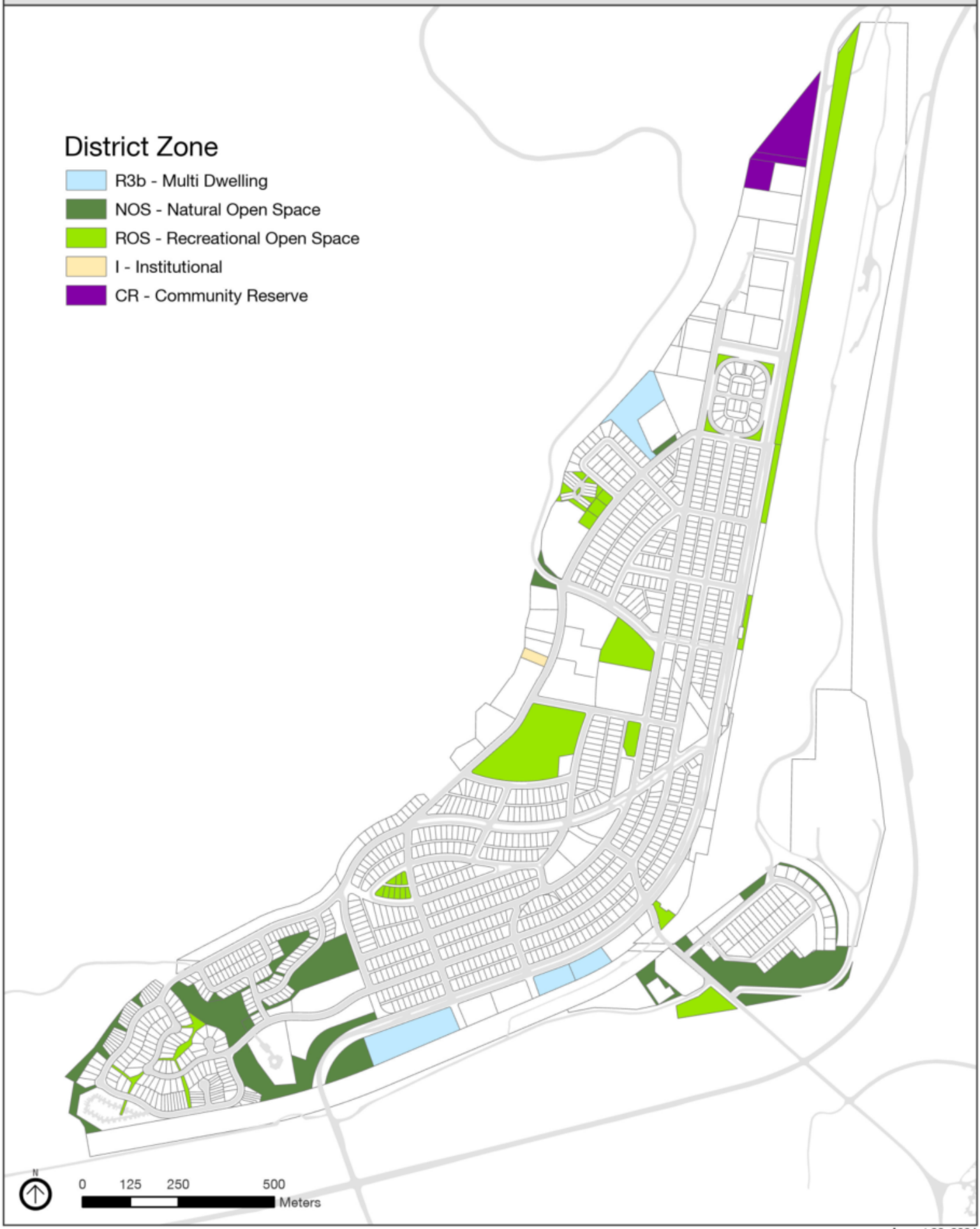
Jasper Townsite Undeveloped Parcels



August 28, 2024