

June 6, 2023

Re: Public Comment in Opposition to Green Truck Farm Major Site Plan Modification and Change of Use to a Marijuana Retail Store at 89 Route 236 (Map28/Lot14-2)

Town Planner Garnham and members of the Town of Kittery Planning Board:

I am a resident of Kittery and reside at 25 Morgan Court. My home is within 250 feet of the proposed marijuana retail store. The single street entrance to access my neighborhood is Fernald Road, which intersects with Route 236, less than 150 feet from the ingress/egress of the proposed marijuana retail store. I and others in my neighborhood have significant concerns, outlined below, about the application for site plan modification and change of use for 89 Rout 236 to include a marijuana retail store, submitted by JD Industries Inc., and do not believe that the proposed project satisfies the criteria for approval under local law.

I. The proposed marijuana retail store does not meet the marijuana business standards in Kittery's Land Use Ordinance.

Under the Kittery Land Use Ordinance, marijuana businesses, including marijuana retail stores, must meet the standards specific to marijuana businesses as well as other applicable standards under the local ordinance and state law. Kittery Land Use Ordinance Section 16.5.32(A). The specific marijuana business standards include: (1) a marijuana business may not locate within 1,000 feet of a public or private school or a public recreation facility measured from the exterior wall of the marijuana business in a straight line to the property line of the protected use; (2) marijuana businesses may not have any odor of marijuana detectable beyond the area controlled by the business; (3) parking must conform to § 16.7.11F, Parking and loading; and (4) marijuana businesses must meet specific security criteria including standards for camera coverage and maintenance of surveillance video recordings.

The application does not meet these standards and/or does not contain adequate information for the Planning Board to determine that it will meet these standards.

1. The proposed marijuana retail store is less than 1,000 feet from a public or private school in violation of state law and the local ordinance.

Great Beginnings Nursery School, which *inter alia* provides educational services to children ages 4-6, is located at 76 Route 236, Kittery. The entire parcel at 89 Route 236, Kittery is within 750 feet of the property line of Great Beginning Nursery School. As such, the proposed marijuana retail store at 89 Route 236 Kittery does not meet the minimum setbacks under the local land use ordinance, Kittery Land Use Ordinance, Section 16.5.32(A), or state law, 28-B MRS 402(2)(A). Accordingly, this Planning Board cannot approve the application for change of use approval to operate a marijuana retail store at 89 Route 236.

Under state law, municipalities are prohibited from approving a cannabis establishment that is within 1,000 feet of the property line of a preexisting public or private school. 28 MRS 402(2)(A). For purposes of determining whether the setback requirement precludes a town from approving a cannabis establishment, the term “school” includes a public school, as defined in Title 20-A, section 1, subsection 24, a private school, as defined in Title 20-A, section 1, subsection 22, a public preschool program, as defined in Title 20-A, section 1, subsection 23-A *or any other educational facility that serves children from prekindergarten to grade 12.* Under state law, “Kindergarten” means a one-year or 2-year childhood education program, for children at least 5 years of age, immediately prior to grade one. Prekindergarten is an “early education program for students who are at least 4 years of age on October 15th of the school year.” That is, the state setback applies to any other educational facility serving children who are at least 4 years of age on October 15th of the school year.

There is a reason for this. In adopting this setback, the legislature considered including daycares. However, after much debate, they decided to draw the line at preschools and other educational facilities serving prekindergarten aged students. They reasoned that the purpose of the setback was to protect children from normalization of recreational marijuana use. Children ages 0-3 seeing a marijuana store would not result in normalization because of where they were developmentally. However, older children, starting at age 4, would be susceptible to normalization of marijuana use from regular exposure to a marijuana retail store. Accordingly, the legislature determined that the setback should apply to educational facilities serving children in this age group: public preschools and educational facilities serving prekindergarten students, but not daycares that only served younger children, ages 0-3.

Further, while towns must comply with state law, they can interpret school more broadly than state law. Kittery’s ordinance provides that marijuana businesses may not locate within 1,000 feet of a public or private school . . . measured from the exterior wall of the marijuana business in a straight line to the property line of the protected use. Kittery’s ordinance broadly defines public or private school as “[a] building or buildings and its associated grounds which is principally used to conduct educational classes including public and private elementary schools and *nursery schools*, including school post-secondary schools, but not including commercial schools. Under Kittery’s ordinance, a commercial school is a trade school or school of art, beauty, business, etc., and it does not include a private nursery school or prekindergarten educational program.

Great Beginnings Nursery School, Inc., which is located at 76 Dow Hwy, Eliot, ME 03903, is within 1,000 feet of applicant Green Truck’s proposed location for a marijuana retail store. Great Beginnings Nursery School, as an educational facility serving prekindergarten students, falls under the catch all in state law, intended to protect children ages 4-5 attending regular educational program from exposure to marijuana retail stores. According to its Facebook page, Great Beginnings Nursery School provides educational services to children ages 4-5. Attached are some examples of the themed educational programming Great Beginnings Nursery School provides, including instruction in literacy, math, science, and art. Further, Great Beginnings Nursery School, as a nursery school, falls within the definition of public and private school in Kittery’s ordinance.

- 2. The application for change of use provides no basis for concluding that the odor of marijuana will not be detectable beyond the area controlled by the business.**

Marijuana has a strong, often offensive, odor. Particularly when cited adjacent to residential areas, these businesses can create a nuisance and interfere with neighboring property owners' quiet enjoyment of their property. As residents living less than 250 feet from the proposed marijuana retail store, we are particularly concerned about the impact of odor from this business on our use of our property.

Nearby towns, including Biddeford, have struggled with the impact of odor from marijuana businesses on homeowners and have had to dedicate significant time and staff resources to addressing these issues. Once a business is licensed, it is almost impossible to address violations of the performance criteria governing odor. This is why Kittery's ordinance provides that to get the required land use approval, a marijuana business must demonstrate that it will not have any odor of marijuana detectable beyond the area controlled by the business. Given that the proposed business is within one unit in a strip mall—with the licensed business controlling just the single unit—this will be a difficult standard to meet.

The application does not include an odor control plan and, in fact, is void of any discussion of odor. It is our understanding that, in other towns, a finding that an applicant for a marijuana business meets odor standards, requires an odor control plan, often prepared by an engineer, that includes:

1. A facility floor plan that identifies the locations of all odor-emitting activities and sources, the location of doors, windows, vents, HVAC systems, odor control systems and other relevant information.
2. A list of specific odor-emitting activities and sources.
3. For each odor-emitting activity or source, a description of the administrative procedures as well as the engineering processes, technologies, and equipment the facility will use.

Because the application for change of use provides no basis for concluding that the odor of marijuana will not be detectable beyond the area controlled by the business, a determination by the Planning Board that the proposed business meets this criteria would be unsupported by the record, arbitrary and capricious.

- 3. The application does not comply with the parking standards unless the second parking area is built, and based on the anticipated increase in traffic in the application, the parking plan is unlikely to be adequate.**

The site plan provided by the applicant indicates that 1,680 square feet of retail space is proposed, which requires 9.6 parking spaces. Combined with the office, restaurant, and storage uses of the building, 28.6 total parking spaces are shown to be needed for this site. With the approved (but unbuilt) parking lot expansion, a total of 29 parking spaces will be provided at the site.

In determining the required number of parking spaces, the town appears to be applying the standard for a retail store in Kittery Land Use Ordinance, Section 16.7.11. However, according to the Institute of Transportation Engineers (ITE), a marijuana dispensary (retail store) generates

10 times more one way trips than a specialty retail store and 4 times more one way trips than a pharmacy.

Weekday	Rate - Trips Per KSF			
	Marijuana Dispensary	ITE 880: Pharmacy w/o Drive Thru ¹	ITE 881: Pharmacy w/ Drive Thru ¹	ITE 826: Specialty Retail ¹
Daily	402.27	90.06	96.91	44.32
AM Generator	37.31	7.71	8.36	6.84
AM Adjacent Street (7-9am)	16.86	2.94	3.45	n/a
PM Generator	63.61	11.07	9.72	5.02
PM Adjacent Street (4-6pm)	54.64	8.40	9.91	2.71

¹ From the Institute of Transportation Engineers' *Trip Generation Manual, 9th Edition*.

Saturday	Rate - Trips Per KSF			
	Marijuana Dispensary	ITE 880: Pharmacy w/o Drive Thru ¹	ITE 881: Pharmacy w/ Drive Thru ¹	ITE 826: Specialty Retail ¹
Daily	418.25	n/a	n/a	42.04
Peak Generator	58.28	10.68	8.20	n/a
AM Adjacent Street (7-9am)	9.02	n/a	n/a	n/a
PM Adjacent Street (4-6pm)	55.92	n/a	n/a	n/a

¹ From the Institute of Transportation Engineers' *Trip Generation Manual, 9th Edition*.

With two spots dedicated to employee parking (which is likely the minimum number of employee parking spaces), that leaves 7 parking spots for customers. According to the site plan application, the anticipated traffic includes 57 one way trips an hour in Peak PM and 500 one way trips a day. If each customer stays for 10 minutes, it will require approximately 10 parking spots to accommodate 57 customers in one hour. The site plan, even with the proposed increase of 11 parking spots based on the site plan approved in November of 2021, would not provide enough parking spaces to accommodate the anticipated number of customers. This is likely to cause traffic flow issues within the parking lot and could result in customers parking outside the designated parking areas, such as along Route 236, which will cause a safety issue.

4. The application for change of use provides no basis for concluding that the marijuana retail store will meet the security requirements.

The application is void of any reference to security. As such, there is no basis for the Planning Board to conclude that this criteria has been met. Further, because the Planning Board is required to determine that the security requirements have been satisfied to approve the change of use the application, which includes no information about security, this application never should have been deemed complete.

II. The application for major modification to the site plan does not meet the general criteria for site plan approval and, thus, the application should be denied by the Planning Board.

- 1. The proposed development will cause unreasonable highway or public road congestion or unsafe conditions with respect to the use of the highways or public roads existing or proposed and the proposed development does not provide adequate traffic circulation, both on and off site.**

The only way to access our homes is the intersection of Fernald Road and Route 236. This intersection is less than 150 feet from the ingress/egress for 89 Route 236. This is already a business intersection, due in part from the traffic generated by 89 Route 236, which already houses multiple businesses. While the parking lot entrance for 89 Route 236 is existing, the increase in traffic from the new use is significant. Because of the close proximity between the exit for 89 Route 236 and Fernald Road, an increase in traffic coming and going from 89 Route 236—particularly an increase of over 500 new one-way trips, or 1,000 two-way trips—is likely to cause congestion and unsafe conditions at the Route 236 and Fernald intersection. The applicant has failed to provide any information demonstrating that this increase in traffic will not adversely impact congestion or safety at the intersection of Route 236 and Fernald Road. Because we have to use this intersection to access our homes, we would be directly and adversely impacted by a Planning Board decision to approve this application.

As discussed earlier, based on the anticipated trip generation, the number of required parking spaces is likely not adequate to meet customer and employee needs. The site plan for the additional parking area was prepared in 2021. The Trip Generation Analysis was prepared by Sewall in March 2023. There is no evidence that the engineers who designed the site plan in 2021 were aware that the proposed use would be for marijuana retail, which generates 10 times the number of trips as general retail. It seems as if it would be important for the engineers designing the site plan for the parking area, which includes making determination about design features to ensure adequate traffic circulation, to understand that the Trip Generation Analysis suggests that the number of customers and employees will likely exceed the number of available parking spots. Because there is new information that will likely impact the site plan development, the Planning Board cannot, without an updated site plan, find that the plan provides for adequate traffic circulation.

- 2. The proposed development will result in undue levels of lighting and has not demonstrated that it will not result in undue levels of odors that will interfere with neighboring residents quiet enjoyment of their property.**

Despite the fact that the Kittery Land Use Ordinance requires marijuana businesses to not produce odor beyond the area controlled by the licensed business, the applicant has submitted no information about odor generation or odor impact. Because marijuana is known to have an odor and throughout the state odor from licensed businesses has adversely impacted neighboring

residential properties, the Planning Board cannot find that the odors from this business will not interfere with neighboring residents quiet enjoyment of their property.

Further, the applicants, who are proposing 10 new light fixtures as part of the new parking area, have provided no information regarding the proposed height of the pole lights for new parking area. None of the proposed plantings will exceed 3 feet. Presumably, the pole lights will exceed 3 feet and, thus, the new plantings will not provide a sufficient buffer from the pole lights. Based on the foregoing, it is impossible to assess the light impact of the expansion of the parking area. However, because our neighborhood abuts that parking area, any additional light pollution, especially without adequate plantings to buffer increased light pollution, will interfere with the quiet enjoyment of our property.

3. Extension of the sewer main requires peer review and updated stormwater control, and post construction monitoring.

The proposed site work was reviewed on the Town's behalf by CMA Engineers as part of the 2021 site plan approval that did not include the sewer expansion work that is newly proposed in this application. In order to adequately assess the impacts of this proposed sewer line expansion and compliance with local law, the Planning Board should request peer review of the sewer expansion work. This is particularly important because the sewer main expansion will include construction and soil disturbance in close proximity to a wetland. Also, because the 2021 site plan did not contemplate the sewer line expansion and because of the proximity to a wet land, the applicant should be required to submit an updated stormwater and erosion control and post-construction monitoring plans.

4. The Planning Board does not have adequate information regarding the location and impact on wetlands and water quality will not be protected.

There is a marshy area, populated with cattails, within 40 feet of the proposed parking area. The application acknowledges that close proximity of the proposed parking expansion to the development stating that the “[n]ew parking facilities [will be] screened by existing vegetated wetland.” These wetland areas are not identified on any of the materials provided by the applicant, all of which were prepared in 2021. In the 2021 application, it was noted that on the site visit, Planning Board members identified a pond that was not identified in the application. Once identified, the pond, which was an existing wetland repurposed as part of a 2016 stormwater plan, was misclassified as a “drainage ditch” by Planning Board in 2021. Under Kittery's definition of drainage ditch at the time, it should have continued to be classified as a wetland. Regardless, Kittery has since amended its land use ordinance to protect constructed wetlands in the same way it protects all wetlands.

It is concerning that these wetland areas are not adequately identified on the application. The application before the Planning Board, which proposes activities that are likely to disturb wetlands and may fall within the wetland buffer, does not provide adequate information to support a finding that it is not wetlands.

Further, as noted above, the expansion of the sewer line will include work in close proximity to an area identified on the survey as a wetland. This was not part of the site plan that was approved in 2021 and the application to modify the plan does not provide an erosion or stormwater plan for that the expansion of the sewer line.

Finally, on the existing plan, the proposed snow storage area (which is limited and does not address what happens when it exceeds capacity giving rise to the risk that there will be even less parking available in the winter or that snow will be dumped into the wetlands) will, in the spring, result in snowmelt with winter sand, which is usually treated with salt, being discharged into the wetlands. Snow dumping is a prohibited activity in a wetland under the Kittery Land Use Ordinance. There is a reason for this. Road salt runoff has potentially serious adverse effects on wetland biota, including invertebrates, amphibians and plant communities. Freshwater salinization from road deicers causes both direct and indirect impacts to wetland plants, animals and food web structure, even at relatively low chloride concentrations (Lob and Silver, 2012, Van Meter et al., 2011). High salt concentrations impact vegetative communities by reducing native species abundance, richness, evenness, and overall cover.

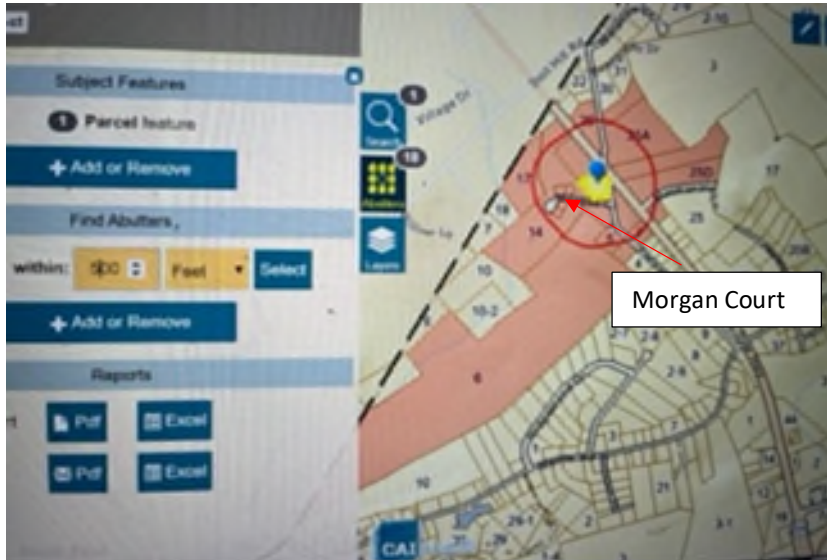
Based on the foregoing, the Planning Board cannot conclude that all of the standards for approval have been satisfied and therefore, must deny the application for modification of site plan approval and change of use at 89 Route 236.

As residents of Kittery, we appreciate your attention to this matter.

Respectfully,

James Folan
29 Morgan Court, Kittery, Maine

Proximity of our homes to the proposed marijuana retail store:



Intersection between Fernald Road and Route 236:



Great Beginnings Nursery School:



Great Beginnings 3 Families

248 likes · 246 followers

 Message



Posts

About

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Videos

Mentions


Bio

Daycare and Preschool serving children 6weeks-6 years of age.

We have immediate openings in our todd

Details

 Page · Preschool

 76 Route 236, Kittery, ME, United States, Maine



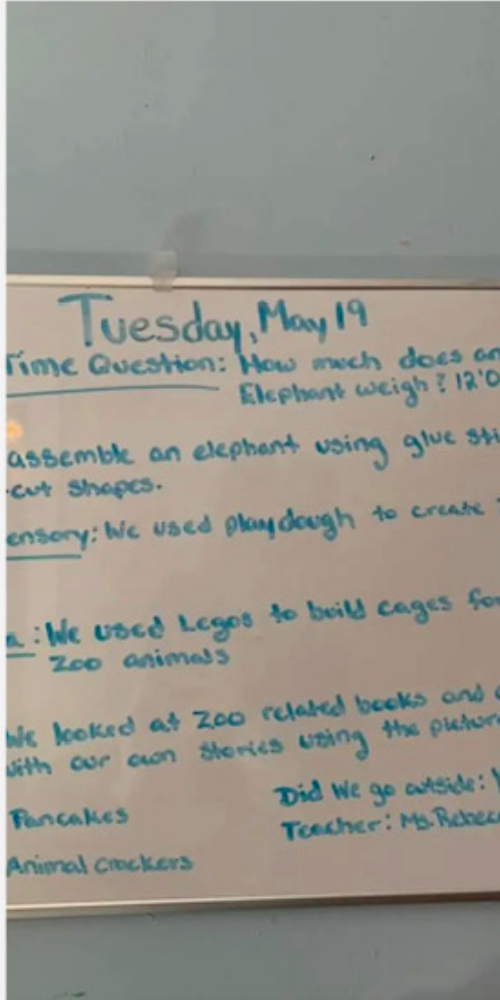
Great Beginnings 3 Families

May 19, 2020 · 🌐



How much does an Elephant weigh?

Family - 140 lbs	Julian - 100 lbs
William - 120 lbs	Lucas - 110 lbs
Colin - 100 lbs	Sam - 100 lbs
Ben - 100 lbs	Mr. Robert - 100 lbs
Casey - 100 lbs	



Tuesday, May 19
Time Question: How much does an Elephant weigh? 12'0
 Assemble an elephant using glue sticks and cut shapes.
Sensory: We used playdough to create
a: We used Legos to build cages for Zoo animals
 We looked at Zoo related books and stories with our own stories using the pictures.
 Pancakes
 Animal crackers
 Did We go outside: Yes
 Teacher: Ms. Rebecca



Tuesday, May 19

Circle Time Question: How much does an
Elephant weigh? 12'000

Art: We assemble an elephant using glue sticks and
pre-cut shapes.

Science/sensory: We used playdough to create Zoo animals

Block area: We used Legos to build cages for our
Zoo animals

Literacy: We looked at Zoo related books and came up
with our own stories using the pictures.

am Snack: Pancakes

PM Snack: Animal crackers

Did We go outside: Yes 3X

Teacher: Ms. Rebecca

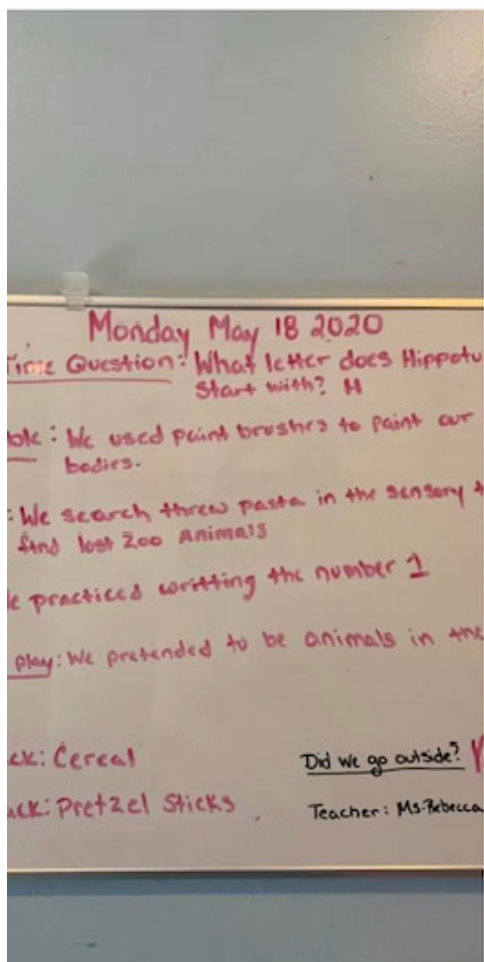


Great Beginnings 3 Families

May 18, 2020 · 🌐



Preschool fun



Monday May 18 2020

Circle Time Question: What letter does Hippotomas
Start with? H

Art table: We used paint brushes to paint our Hipp puppet
bodies.

Science: We search threw pasta in the sensory table to
find lost Zoo Animals

Math: We practiced writing the number 1

Dramatic play: We pretended to be animals in the Zoo

Am Snack: Cereal

Did we go outside? Yes 3X

PM Snack: Pretzel Sticks

Teacher: Ms. Rebecca

axiagis.com/KitteryME/

Kittery, ME

Parcel # 28-26, Owner Name - GREAT BEGINNINGS
 NURSERY SCHOOL, INC. Acreage: 1, Zone: C-2

LAND AREA IN ACRES	1
NHBD	C4
NHBD ADJ	1
Book	16850
PAGE	0346
PRICE	150000
SALE DATE	2014-7-2
DEPTH	0
LAND VALUE	143900.00
AV pin	???

esri

71°F Sunny 1:39 PM 5/8/2023

axiagis.com/KitteryME/

Kittery, ME

Measurement Result

Total	655.1 Feet
Segment	1.4 Feet
Segment azimuth	0°

esri

71°F Sunny 1:39 PM 5/8/2023

June 6, 2023

Members of the Kittery Planning Board and the Kittery Town Council,

High Maine LLC (High Maine) is a limited liability company that is incorporated in the State of Maine and in good standing. High Maine has filed an application for a marijuana retail store with the Town of Kittery for a marijuana retail store to be located at 1 Route 236, Kittery, ME 03904, which is located within the C-2 zone. Because Kittery's Marijuana Licensing Ordinance only authorizes one marijuana retail store in the C-2 zone, High Maine's application will be placed on the waiting list. Many applicants on the waiting list applied using the same property, under different entities and/or unit numbers with the same parcel. There are only six properties associated with each of the applications on the waiting list for the C-2 zone (with a total of 248 pre-applications that the town accepted for the initial lottery). Most of the applicants were placed on the waiting list following the lottery for marijuana retail store licenses that was held on October 28, 2021, over a year and a half ago. Since that time, several of the properties associated with applications on the waiting list were rented out or sold and, thus, are no longer available to the listed applicant.

The Town of Kittery's Marijuana Licensing Ordinance, Section 5.11.9(E), provides a procedure for processing applications on the waiting list. Specifically, the Ordinance states that "[a]pplications will not be processed from the wait list if there have been any material changes to ownership, as indicated on the ownership affidavit, or where there is a change to location of the Premises." (emphasis added). Accordingly, any application on the waiting list that lists a property that is no longer available, would not be processed. This likely eliminates most, if not all, of the applicants on the waiting list. High Maine's property, however, continues to be available to the Company. For this reason, despite being last on the waiting list, if the current applicant is found to not meet the applicable local land use or licensing standards and, thus, the application is denied, there is a high likelihood that High Maine would have an opportunity to pursue a marijuana retail store license in the C-2 zone in Kittery. Accordingly, High Maine would suffer a direct and particularized injury if the Town wrongfully approves the application for a change of use or modified site plan approval or the license for GTF Kittery 8, LLC.

As an initial matter, the Town cannot process GTF Kittery 8, LLC's application because it is for a different location than the pre-application from the wait list that is being considered. On February 27, 2023 the Town advised GTF Kittery 8, LLC that its application, which had been placed on the wait list following the initial lottery under MPA-505, was going to be considered. GTF Kittery 8, LLC subsequently submitted a license application, modified site plan, and an application for a change of use. In these submissions, GTF Kittery 8, LLC proposes to operate a marijuana retail store at 89 Route 236, Units 2 and 3. However, the pre-application that is being considered—MPA-505—is for a marijuana retail store to be operated at 89 Route 236, Unit 3. See attachment A. The Kittery Marijuana Licensing Ordinance, Wait List Procedures, 5.11.9(E) provides that "[a]pplications will not be processed from the wait list . . . where there is a change to location of the Premises" (emphasis added); *see also* Kittery Marijuana Licensing Ordinance, 5.11.8 ("A Licensee who seeks to operate in a new location must acquire a new license for that

location.”). The Ordinance defines “Premises” as “the physical location at which a Marijuana Business is to conduct its business.”

89 Route 236, Unit 3 is necessarily a separate and distinct location from 89 Route 236, Unit 2 for licensing purposes, because GTF Kittery 8, LLC also filed a pre-application to operate a marijuana retail store at 89 Route 236, Unit 2 (MPA-446) and applicants were expressly prohibited from submitting more than one pre-application per location for the lottery. Kittery Marijuana Licensing Ordinance, 5.11.9(A) and (B); *see also* Kittery Marijuana Licensing FAQs (“an entity may submit one pre-application per separate property” and “multiple pre-applications will be accepted for the same property. However, only one preapplication will be accepted per unique entity (TIN) for the property.”). If Units 2 and 3 were in fact a single location, GTF Kittery 8, LLC, should not have been allowed to submit separate pre-applications for Unit 2 and Unit 3. Because GTF Kittery 8, LLC submitted separate applications for Unit 2—MPA-446—and Unit 3—MPA-505, an application to operate in Units 2 and 3 combined is a change in location of the Premises and, thus, the Town is precluded from processing the application.

Not only did GTF Kittery 8, LLC file separate pre-applications for Units 2 and 3, 25 other GTF entities did the same thing, thereby submitting a total of 50 pre-applications total for these two units (25 for Unit 2 and 25 for Unit 3). If Units 2 and 3 are in fact a single premises, only one pre-application per TIN should have been allowed and allowing them to file two pre-applications for a single location unfairly and unlawfully increased the owners of the GTF entities’ odds of winning, while correspondingly decreasing the odds for other applicants who followed the rules. We have reason to believe that the GTF entities may have done the same thing for Unit 4—submitting separate pre-applications for Unit 4 to increase their odds—but including a layout that shows the proposed retail store operating in Units 2 and 3. All GTF pre-applications that were filed for locations that did not match the layout for the proposed retail store premises, or that demonstrate that one GTF entity submitted multiple applications for the same or a single Premises, were filed in direct violation of the Ordinance and the Town’s guidance and, as such, should be disqualified.

In addition, GTF Kittery 8, LLC’s application for change of use cannot be approved because the proposed marijuana retail store is within 1,000 feet of a school. In 2021, we also looked at prospective marijuana retail store locations along the same stretch of Route 236, but did not pursue them because of the proximity to Great Beginnings Nursery School, LLC. State law prohibits municipalities from approving marijuana retail stores within 1,000 feet of “any [] educational facility that serves children from prekindergarten to grade 12.” 28-B M.R.S. § 402(2)(A). Likewise, Kittery’s ordinance prohibits the siting of a marijuana business within 1,000 feet of a “public or private school,” defined in Kittery’s land use ordinance to include nursery schools. *See* Town of Kittery Land Use and Development Code, Section 16.3.2 (a “public or private school” is “[a] building or buildings and its associated grounds which is principally used to conduct educational classes including public and private elementary schools and nursery schools, including postsecondary schools, but not including commercial schools.”

Great Beginnings Nursery School is an educational facility that provides educational instruction to prekindergarten children include instruction in math, literacy, art, and science. It is also a

nursery school. Because the proposed marijuana retail store at 89 Route 236 in Kittery is located within 1,000 feet from the property line of Great Beginnings Nursery School, this Planning Board cannot, under both state and local law, approve the store's application.

There appear to be a myriad of other issues with the change of use application and application for a modification to the site plan approval including, but not limited to, failure to demonstrate compliance with other marijuana business performance criteria, failure to satisfy general zoning standards, such as providing adequate parking, as well as potential violations of state and local laws intended to protect wetlands. We reserve the right to challenge any deficiency in the application.

Thank you for your attention to this important matter.

Respectfully,

A handwritten signature in black ink, appearing to be "D. E. White", written in a cursive style.