



Appeal or Request for Reconsideration

Planning & Development Services · 1800 Continental Place · Mount Vernon WA 98273
voice 360-416-1320 · inspections 360-416-1330 · www.skagitcounty.net/planning

| |
|----------------------|
| File #: PL22-0583 |
| 12/2/2022 |
| Received by: PA |

Appeal

What are you appealing?

- Appeal of an Administrative Interpretation/Decision/Action to the Hearing Examiner
- Appeal of an Administrative Order to Abate (code enforcement order) to the Hearing Examiner
- Appeal of Impact Fees to the Hearing Examiner (impact fees must be paid) (SCC 14.30.070)
- Appeal of Hearing Examiner Decision/Action to the Board of County Commissioners
- Request for Reconsideration of a Hearing Examiner Decision (SCC 14.06.180)

| | | | | |
|--|--|------------------------|----|---------------------------|
| File # of Appealed Decision or Permit | | Appeal Fee | \$ | <i>PDS will calculate</i> |
| Date of Appealed Decision or Permit | | Publication Fee | \$ | <i>PDS will calculate</i> |

PDS staff: do not accept appeal form without full payment of fees

Appellant

| | | | | |
|---------------------------|--|------------------|--|--------------|
| Standing to appeal | <input type="checkbox"/> Permit applicant <input type="checkbox"/> Party of Record <input type="checkbox"/> Party subject to code enforcement order <input type="checkbox"/> Other | | | |
| Name | | | | |
| Address | | | | |
| City, State | | Zip | | Phone |
| Email | | Signature | | |

Attorney or Representative

None

| | | | | |
|--------------------|--|------------|--|--------------|
| Name | | | | |
| Address | | | | |
| City, State | | Zip | | Phone |
| Email | | | | |

Attachments

- For any of the **appeals** listed above, please attach a concise statement with numbered responses to the following questions.
 1. What is your interest in this decision?
 2. How are you aggrieved by the decision you are appealing?
 3. What are the specific reasons you believe the decision is wrong?
e.g. erroneous procedures, error in law, error in judgment, discovery of new evidence
 4. Describe any new evidence.
 5. List relevant sections of Skagit County Code.
 6. Describe your desired outcome or changes to the decision.
- For a request for **reconsideration** of a Hearing Examiner decision, attach a statement identifying the specific errors alleged.

PL22-0583
RECEIVED
MAY 12 2022
SKAGIT COUNTY

**SKAGIT COUNTY PLANNING AND DEVELOPMENT SERVICES
MITIGATED DETERMINATION OF NONSIGNIFICANCE (MDNS)
For: Predators of the Heart File Number: PL22-0133**

SEPA DETERMINATION APPEAL

I. SUMMARY FACTUAL BACKGROUND

- 1.1. Predators of the Heart (POTH) is a Washington nonprofit, 501(c)(3) organization and has existed since 2001 at its Skagit County location since that time.
- 1.2. This statement of facts is not exhaustive; it is intended only as a summary.
- 1.3. POTH has established itself as a fixture in the community, being noted on many lists as “a reason to visit” Skagit County and the City of Anacortes. See attached **Exhibit A**.
- 1.4. More importantly, POTH has established itself as a resource over 20+ years in operation for law enforcement and other governmental agencies, including, but not limited to, the U.S. military and various animal control agencies.
- 1.5. Because of its interaction and resourcing for government agencies, including its USDA licensing, POTH is also required to have in-depth, regular and random inspections by federal agencies, including the USDA and animal control.
- 1.6. Because of its activities with government agencies, POTH is excluded from certain restrictions as to so-called “potentially dangerous animals”. These exemptions have been noted extensively throughout this process, and include, but are not limited to its work with governmental agencies, and the care that it provides for confiscated and rescued animals. POTH provides a public service and operates as an animal sanctuary under both Washington and Skagit County law.
- 1.7. The County has never required any SEPA or other determinations requiring additional permitting for POTH over its 20+ years on the property, despite its knowledge and clear understanding of its existence. In fact, POTH attempted to apply for a Special Use Permit in 2015. After filing its required paperwork and submitting payment, the County refunded POTH its money, noting that POTH did not require any Special Use Permit.
- 1.8. To this point, POTH has always met every governmental regulation and requirement asked of it. Again, POTH previously sought to file for a Special Use Permit but was turned away and refunded its money. As a result, POTH relied on those comments and continued to provide services to local, state and federal government agencies, providing sanctuary and safe-keeping for confiscated, abandoned and rescued animals. Over eighty-percent (80%) of POTH’s animals have been rescued and have been provided sanctuary by POTH.
- 1.9. In addition to its work with governmental authorities, POTH also showcases its animals annually at various fairs statewide for the purpose of public education and in furtherance of its nonprofit mission.

II. PROCEDURAL BASIS FOR APPEAL

- 2.1 POTH is exempt from SEPA considerations because it has no plans for growth or construction, aside from what Skagit County has required under its Mitigated

Determination of Nonsignificance. This means that the MDNS itself requires action that would then require an Environmental Study or EIS.

- 2.2 Skagit County has required POTH to implement actions that would be deleterious to the environment, including the wildlife surrounding POTH, but also to the land itself as set out below. POTH is exempt from SEPA considerations because it has not proposed any plans for construction or growth.

III. SUBSTANTIVE BASIS FOR APPEAL

The basis for POTH's substantive appeal is that (1) it has been in lawful operation for over twenty (20) years, with notice to Skagit County and (2) the requirements by Skagit County are unreasonable in their scope and magnitude.

Primarily, Skagit County is requesting that POTH exceed both the American Zoological Association's (AZA) requirements for licensing as well as the USDA's requirements for animals. POTH is appealing the decision because it has exceeded all governmental requirements, including that of the USDA, has no potentially dangerous animals bordering any neighboring property, and has agreed to have two layers of fencing for all of its animals that fall under the "potentially dangerous" designation.

Pursuant to RCW 42.21C.060, any exercise of authority by a government entity—here, Skagit County—must be *reasonable*. Under RCW 42.21C.060, "[s]uch action may be conditioned only to mitigate specific adverse environmental impacts which are identified in the environmental impacts which are identified in the environmental documents prepared under this chapter." Further, "...measures shall be *reasonable* and *capable of being accomplished*."

In short: Skagit County's requirements under the MDNS are neither reasonable nor capable of being accomplished.

Specifically, as related to Skagit County's requirements for fencing the requirements are not only harmful but are also in conflict with federal regulations related to the care and safekeeping of the animals. Further, POTH has set out proposed changes to the MDNS whereby POTH will meet the spirit of the requests by Skagit County.

(a) Six-Sided Fencing

POTH has already implemented six-sided fencing for its wolfdog population. However, during the day, when staff are present, the wolfdogs need an exercise area that is big enough to run and topping is not possible. Again: staff will be present when these day runs are used, but there are times when wolfdogs must be allowed to run when they are not leashed.

This means that POTH is proposing, as noted below, that the wolfdogs (and other animals categorized as "potentially dangerous") have TWO perimeter fences for their enclosures, along with their night enclosures. However, in their daytime runs, with staff present, the daytime runs would not have a "top" but would have three-strand electric fencing. The electric fencing would also be on the middle and bottom of these fences so as to deter potential dig-outs by the wolfdogs.

(b) Perimeter Fencing.

Skagit County has requested that we fence in the property and it's entirety 2 times with 8' fencing, 9 gage wire, with 2' tilt ins at 45° angle, and a 2' concrete wall in ground for dig out.

These requirements violate Skagit County Code as noted above. Creating these kinds of fences would require blasting into the mountain/hillside, which is rock face. This action would not only have an extremely deleterious effect on the natural growth, but it would be contrary to the Rural Reserve zoning where the Property is situated. In addition to the layers of fencing already in place, there are also natural barriers that have been created with many years of growth.

The requirement for a complete perimeter fencing is in violation of RCW 42.21C.060. A perimeter fence around the entirety of the property not only would bankrupt the organization, but is physically impossible. The property is located on the side of a mountain. To properly install such a fence, POTH would have to blast the mountainside, thus harming the environment in egregious ways. This means that Skagit County is requiring POTH to not only perform an unfeasible task, it is asking it to perform a task that would unnecessarily and deleteriously harm the environment.

Additionally, this requirement goes beyond what the AZA and USDA, and virtually all other similar organizations in the state of Washington, are required to do. POTH has already amended its operations so that every animal designated as "potentially dangerous" has been moved so that no enclosure borders any neighboring property and that every animal designated as "potentially dangerous" has a "double-fenced" enclosure.

ALTERNATE PROPOSAL:

Instead of an 8-foot perimeter fence around the entire property, POTH proposes a T-post and barbless fence around the property so proper required signage can be hung. Further, POTH would additionally implement two perimeter fences around "potential dangerous animals" enclosures or main animal holding area itself.

Of note: the requirements requested by Skagit County are far in excess of USDA requirements. The Cougar cages have this setup: two perimeter fences, which bar escape. This also includes two locked gates, which is in compliance with the notes below. Pursuant to USDA requirements, all mammals must have a perimeter fence with six foot fencing with two foot tilt ins; the cougars, which are climbing animals, have eight foot fencing. These requirements for other animals (i.e. wolfdogs) are not only unnecessary, they are unreasonable because wolfdogs do not climb like cats—they dig, because they are dogs

Additionally, as part of POTH's alternative proposal, POTH would install supplementary dig outs around each potentially dangerous animal instead of a 2' concrete wall. This would prevent digging through or under the wall, and would not block any natural drainage on the subject Property. This would again allow for continued compliance with the Rural Reserve zoning as well as the other applicable Skagit County Code sections. This would consist of a 4' inlay fence being laid in a select few day runs. All other runs already have dig outs. This means that POTH

would lay chain-link or cattle panel at the base of the fence edge 4' inward on ground and cover with proper mulch or ground cover. This way if the animal were to dig at fence line or 4' inward they would hit fencing. We would also do this around the main edge of the potentially dangerous animals Perimeter fencing. This is a more practical safety measure, again, because wolfdogs are considered dogs—they dig, not climb.

(c) Eight-Foot Fencing.

As noted above, the eight-foot fencing with two-foot tilt-ins is far in excess of USDA requirements. POTH has already built a perimeter fence for the “potentially dangerous animals” it houses, and is willing/able to implement a secondary fence as well as install additional concrete dig-outs so as to prevent digging (which is the more common action by wolf-dogs). The cougars already are in six-sided enclosures 24/7 and cannot escape. Please refer to POTH’s proposal above to effectuate the desired outcome as stated by Skagit County.

(d) Secondary Perimeter Fencing.

POTH requests that Skagit only require a secondary perimeter fence around the “potentially dangerous animals”. A full-property chain link fence is not only an expense that would likely bankrupt the organization, thus requiring the euthanization of all animals housed by POTH on behalf of various animal control, state and federal agencies, but would also be unnecessary.

This is in violation of RCW 42.21C.060. A perimeter fence around the entirety of the property not only would bankrupt the organization, but is physically impossible. The property is located on the side of a mountain. To properly install such a fence, POTH would have to blast the mountainside, thus harming the environment in egregious ways. This means that Skagit County is requiring POTH to not only perform an unfeasible task, it is asking it to perform a task that would unnecessarily and deleteriously harm the environment.

As stated by Skagit County, the primary concern is the “potentially dangerous animals”. A secondary perimeter fence for the other animals—is unnecessary. Thus, a secondary perimeter fence for the potentially dangerous animals serves to protect the community as noted by Skagit County while also preserving the resources to care for these animals.

(e) Below Grade Fencing.

POTH is willing to employ fencing that is “comparable to” below grade fencing with mesh so as to prevent dig-outs, but due to the topography and terrain, a below-grade fence is impractical and/or impossible. POTH already employs this method effectively and has already begun this process. The concrete dig-outs proposed by POTH above also effectuate this same goal; it prevents the animals from digging out while simultaneously preserving the terrain for the animals and the Rural Reserve designation.

Again, the below-grade fencing required by Skagit County is in violation of RCW 42.21C.060. The “below-grade” fencing is not required by AZA or USDA standards, and POTH, as noted

above, has provided an alternative to keep with the requests as asked by the County. This is an unreasonable requirement.

(f) Motion Detected Lights

Skagit County has requested that POTH install motion detected lights for all of its perimeter fencing.

This requirement is in violation of RCW 42.21C.060, as it requires POTH to violate its nonprofit purpose and harm its animals. Many of POTH's animals, including those rescued or given safe-haven on behalf of government agencies, are nocturnal. POTH's facilities border trails and rural, wilderness whereby many animals would or could repeatedly set off any motion-detection lights. Motion-detection lights going off repeatedly would not only harm the animals, but would also violate POTH's requirements by law—because it would harm said animals.

POTH has already implemented a state-of-the-art motion-detection system that does not employ extensive lighting but *does* employ *night-vision*. This means that POTH's 24/7 system can clearly see all animals and other objects, including human beings, that may encroach onto its property.

Motion detection lights are and will be harmful to the animals that POTH provides sanctuary for. As an animal sanctuary, POTH is required to provide habitat that is as close to the habitat that the animal(s) live in as is feasible. A motion detection system would cause psychological damage to the animals. POTH currently employs a motion sensor camera system for the *entire property* which is also equipped with night vision. This means that all activity is tracked.

Additionally, POTH proposes that instead of motion detection lights, POTH install a hard-wired lighting system around its T-Post fence so that if further investigation is necessary, lighting can be turned on. Again: motion detection is already in place, but the constant lighting would be problematic for the animals. It would also violate POTH's nonprofit, religious purpose.

Motion detection lighting would also likely be triggered by the many dogs in the area as well as the additional wildlife in the area that borders the POTH property. A motion detection light would be harmful to the animals, but likewise would be problematic to the neighboring properties.

(g) Manning Property

Neither the Association of Zoos and Aquariums (AZA) nor the USDA require a 24-hour manning of facilities. This means that even the Woodland Park Zoo is not required to have 24-hour manning of its facilities.

Given that all potentially dangerous animals (i.e. wolfdogs, cougars, etc.) will be housed in six-sided, unescapable enclosures at night, a 24-hour manning is an unreasonable requirement. Further, given POTH's limited resources, and the extensive efforts being made to continually improve on security measures, an on-site employee at POTH's property is an unreasonable requirement.

Additionally, as noted above, POTH has state-of-the-art electronic surveillance. For instance: in June 2022, a false report was made that a “wolf had escaped”. POTH employees were able to confirm within 2 minutes that there was no escape and that all wolfdogs were present and accounted for. Animal Control was provided with the footage from the property, verifying that no escape had ever occurred.

Further, the animals can sense a person on-site; they, like all animals, need to be able to retreat from exposure to people. Exposure to people is different from a person; they can smell, hear and sense the presence of a person on-site. Like constant motion detection lighting, a person on-site would be damaging to the animals and their senses.

A person on-site 24 hours a day is unnecessary and unreasonable requirement. It would also harm the animals, thus violating federal and other requirements under state law.

(h) GPS Collars

No other wolf or wolfdog sanctuary, including, but not limited to, Wolfshaven or Wolfshollow, employ GPS tracking. Skagit County asking for POTH to put on GPS collars for all animals designated as “potentially dangerous” is unreasonable and in violation of Washington law. Additionally, such an action is unreasonable and unnecessary because of the additional requirements previously agreed-to by POTH.

GPS collars are not only expensive, but the technology is ineffective and impractical for these kinds of animals. Like all dogs, wolfdogs destroy these kinds of collars. When in day runs, which have extensive security measures in place, and would be the only place that these collars would be used according to the Mitigation Measures outlined by Skagit County.

As a reminder, POTH has and continues to immediately employ:

- Six-sided night enclosures with additional concrete dig-outs;
- Two perimeter fences for all of the “potentially dangerous animals”;
- Full-coverage, 24/7 surveillance system;
- Electric fencing as part of the day run(s).

As such, the fencing changes and requirements, in addition to the state-of-the-art surveillance system, means that GPS collars are unnecessary. The fact that literally no other organization in the state employs such collars shows that Skagit County’s requirements are unnecessary and unreasonable. These collars would be broken and destroyed quickly by animals who are not collared; they are meant to be kept in as natural a state as possible according to federal and state requirements—requiring constant collaring would be in violation of those laws.

IV. REQUEST FOR AMENDED MDNS/SEPA DETERMINATION

POTH has already implemented or has had in place prior to this Mitigated Determination of Nonsignificance (MDNS). However, some of the additional measures, as noted below, are unreasonable and impossible to accomplish. Others are unreasonable because of their

impracticability in terms of the effectiveness of the safety that they would provide both to the animals and the community.

Some of the mitigation measures, with note specifically to the requirement that POTH install a perimeter fence around the entire property, is unreasonable and impractical both for safety and financial reasons.

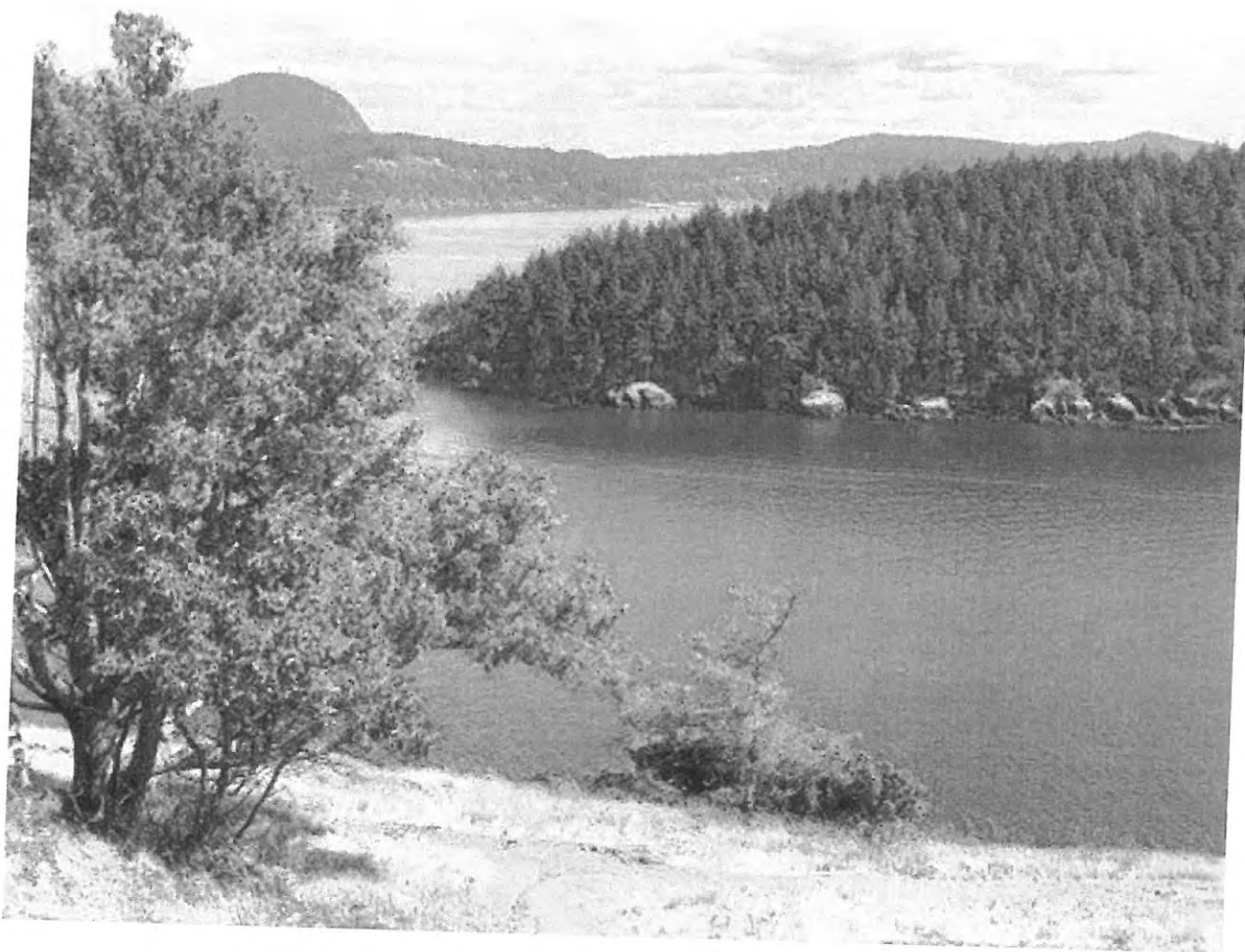
Instead, POTH can and will multiple layers of fencing around the animals as identified as “dangerous” by Skagit County: the wolfdogs, cougars and other dangerous animals, both now in the future. POTH has already implemented six-sided fencing for all of its wolfdogs as well as its cougars; it has also implemented multiple levels of fencing so that there are layers of fencing (i.e. two six-foot fences with two-foot tilt-ins on day-runs) as well as so-called “hot” fencing, meaning that the fences are electrified.

POTH has submitted its own comments related to the SEPA MDNS. POTH is requesting that its alternative proposal be accepted as an alternative to the MDNS, as Skagit County’s current MDNS, as written, has unreasonable and impossible actions that are required by POTH to undertake.

EXHIBIT A

TOP ATTRACTIONS IN ANACORTES

[See all](#)



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-
-

1. Washington Park

545

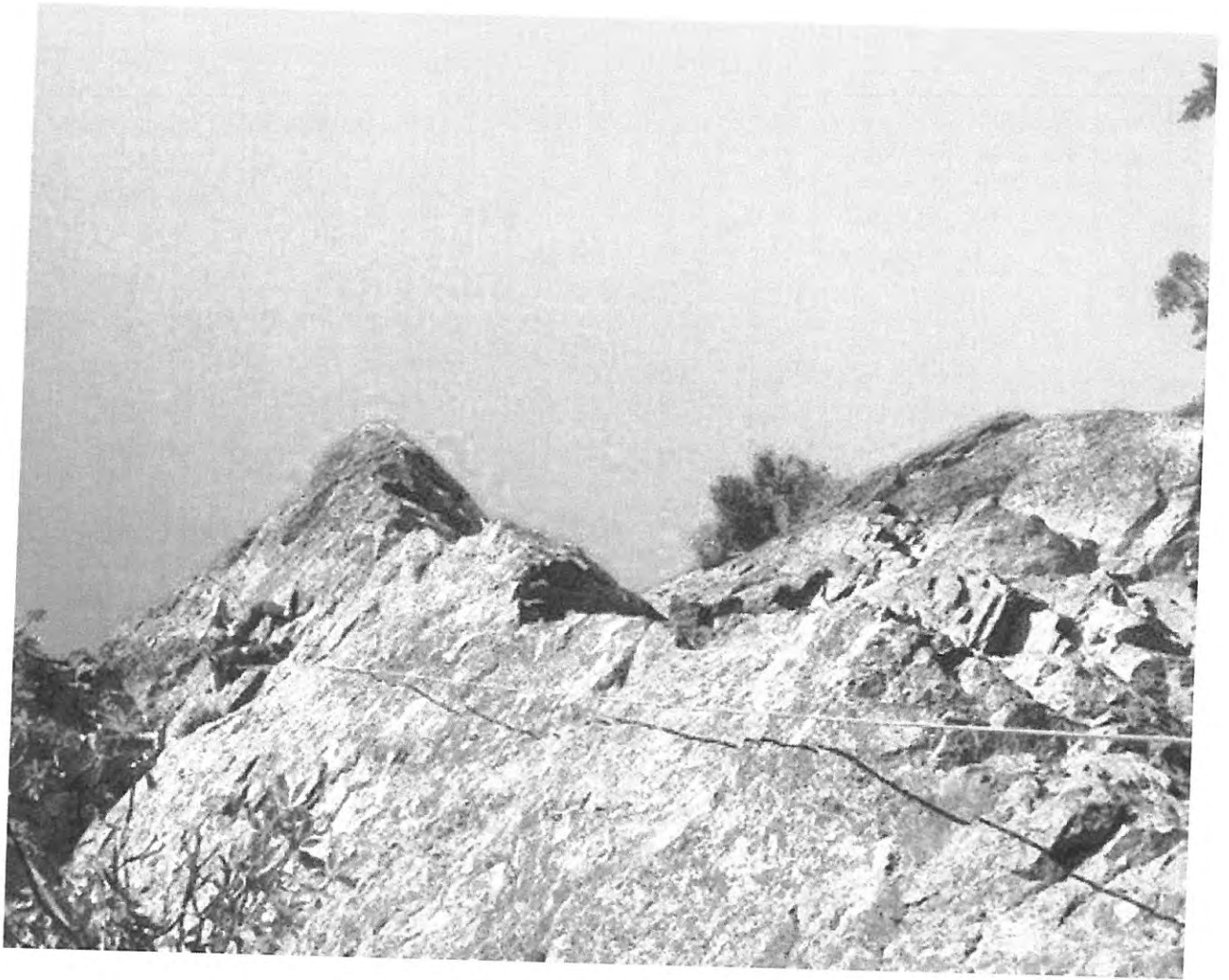
Parks

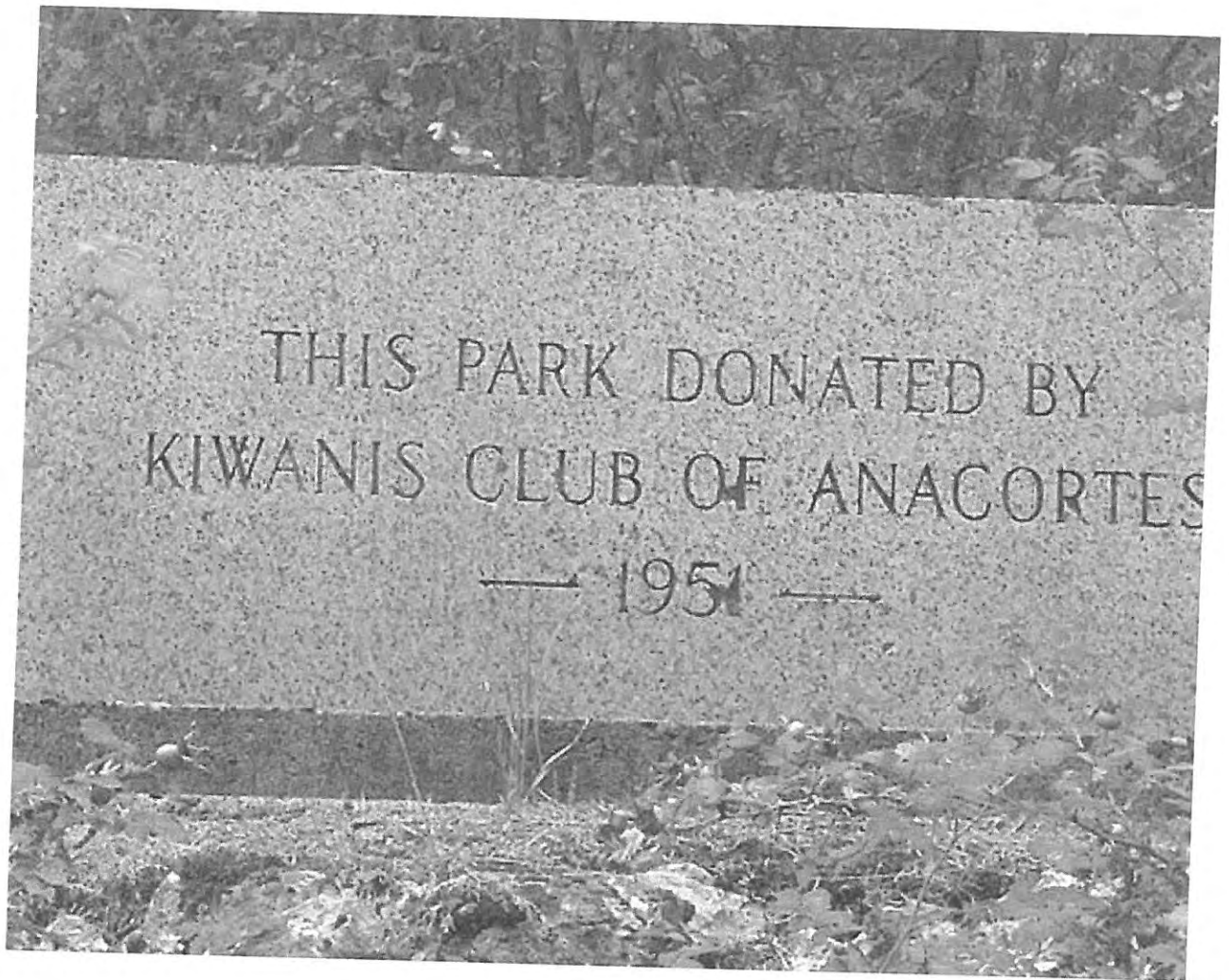


By NahanniRafter

It has quiet forrest trails; "calendar" views of sea, sky, and trees; geological wonders, beaches, and geo-caches.







2. Mt Erie Park

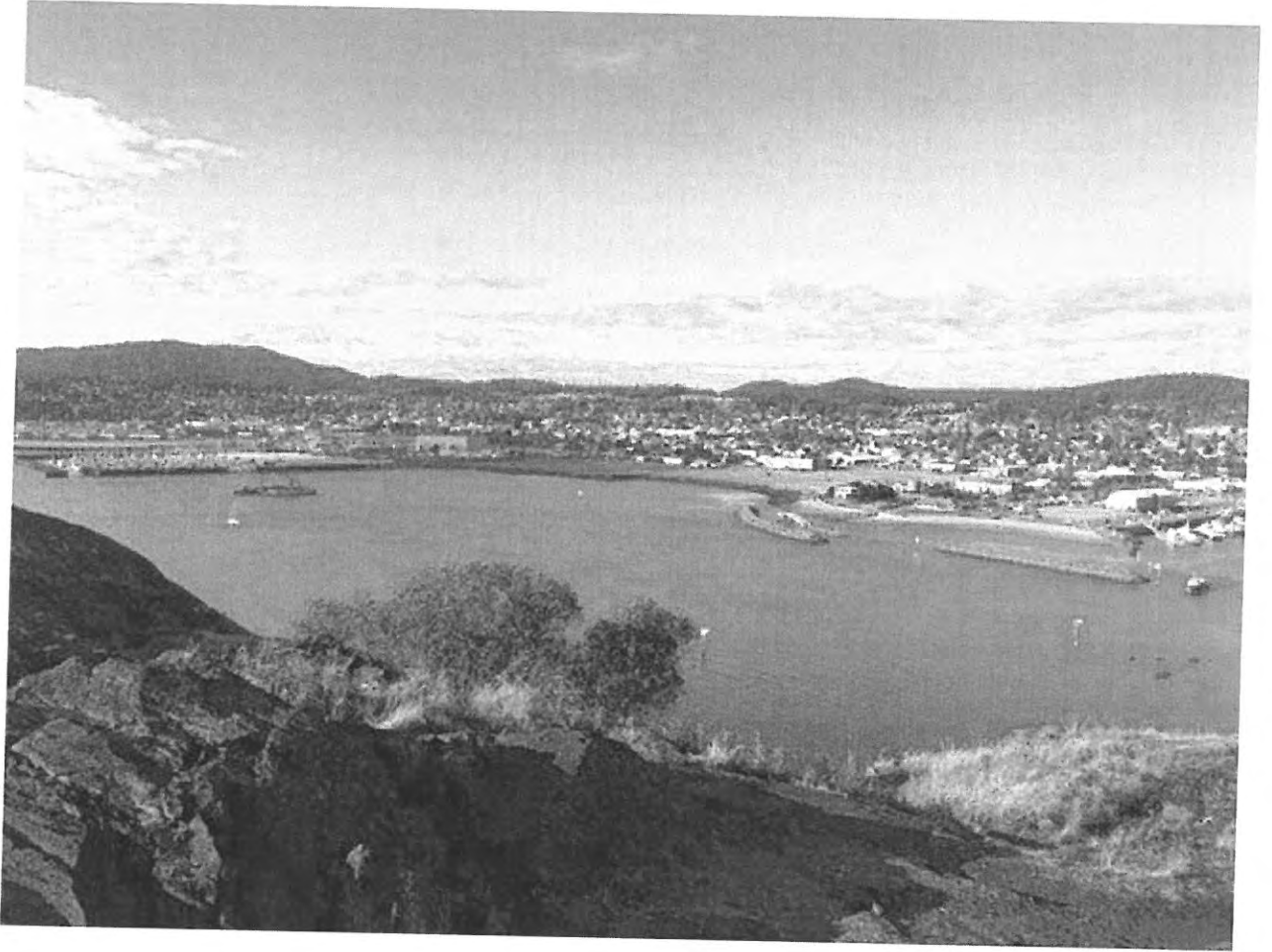
249

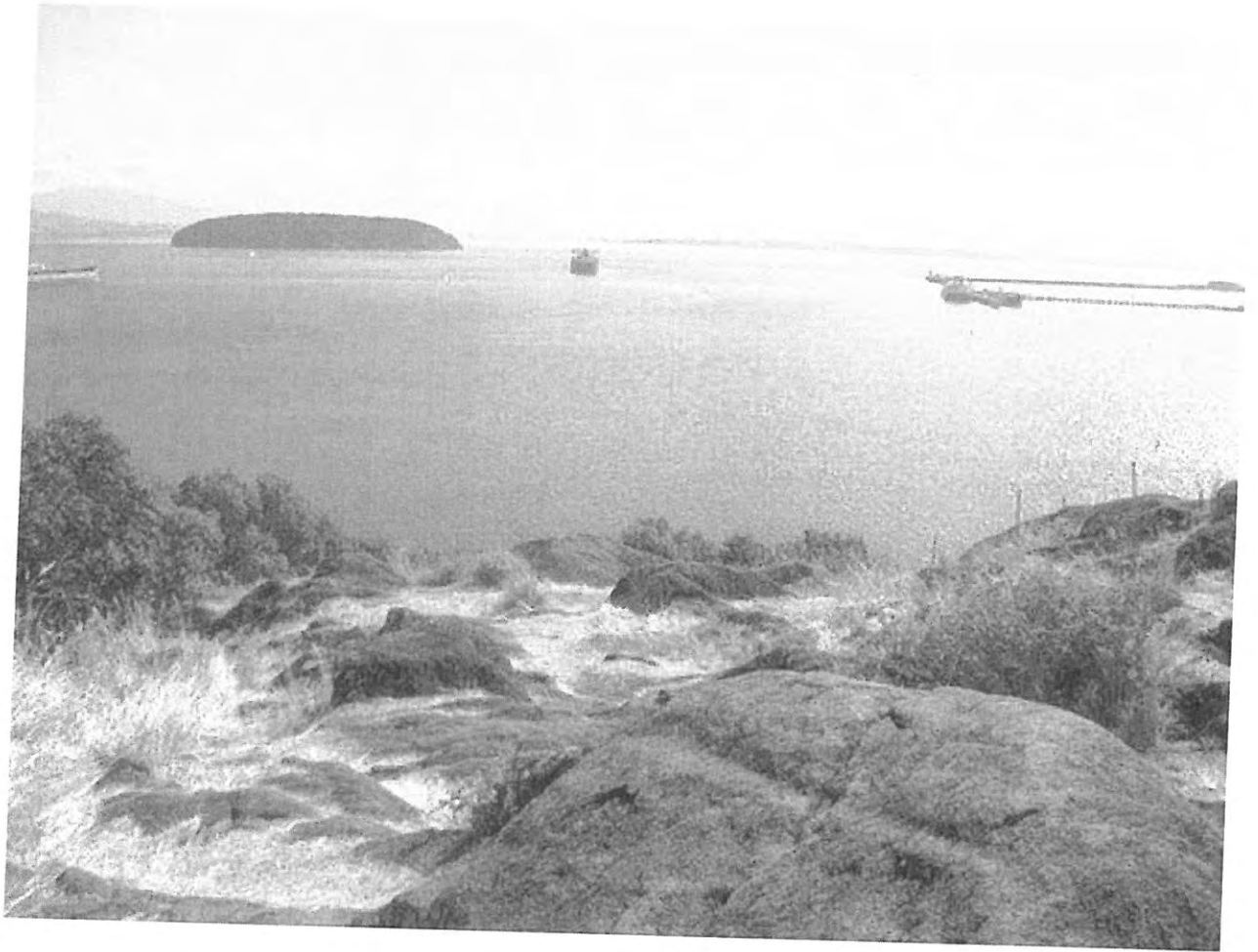
Mountains

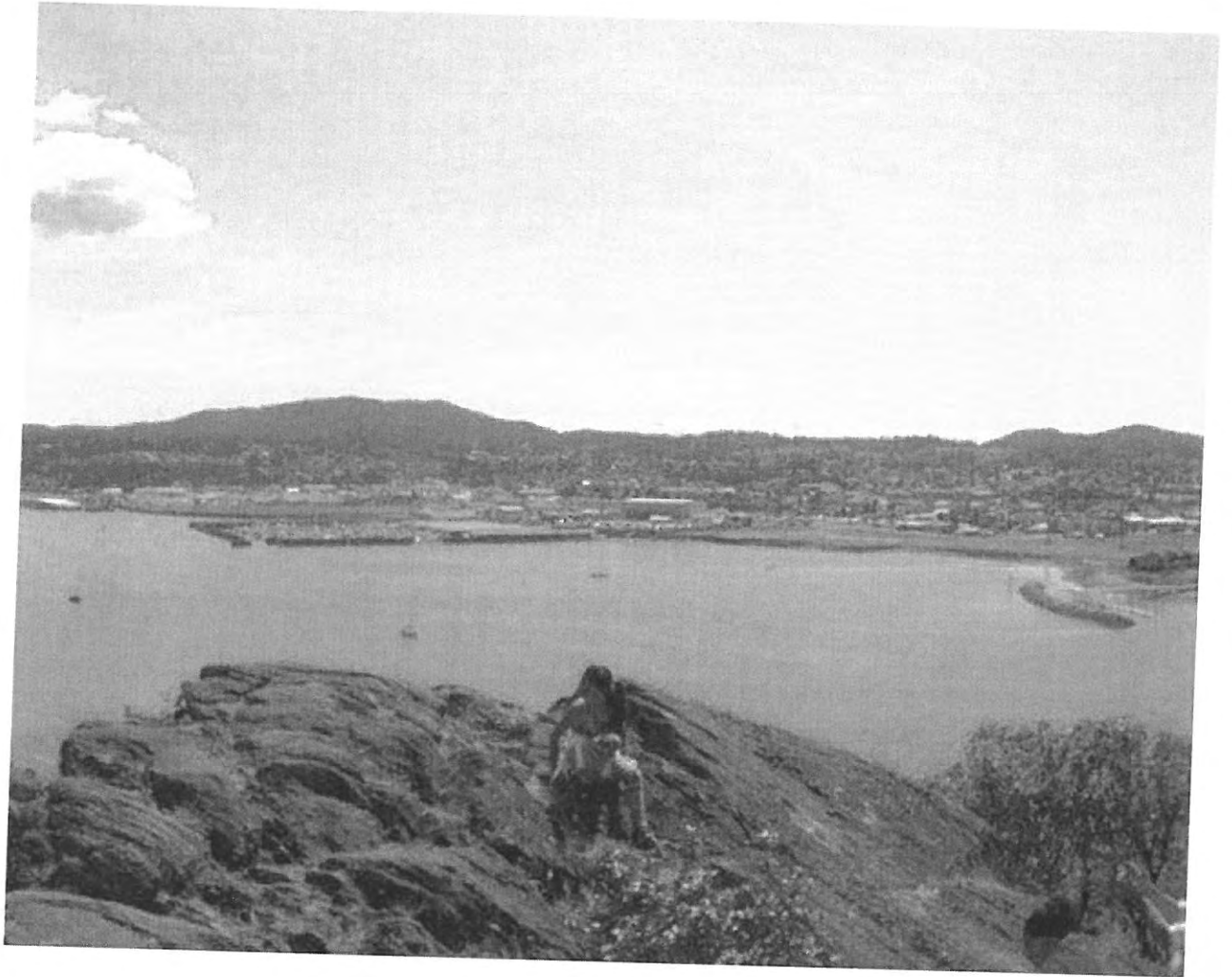


By [n0ram66](#)

Once we got to the parking area it was an easy walk to the viewpoints which included a stone bench, a memorial for a...







3. Cap Sante Park

220

Parks



By OregonCal

Pack a picnic and drive up to the lookout and watch the sun go down.



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•

4. Predators of the Heart

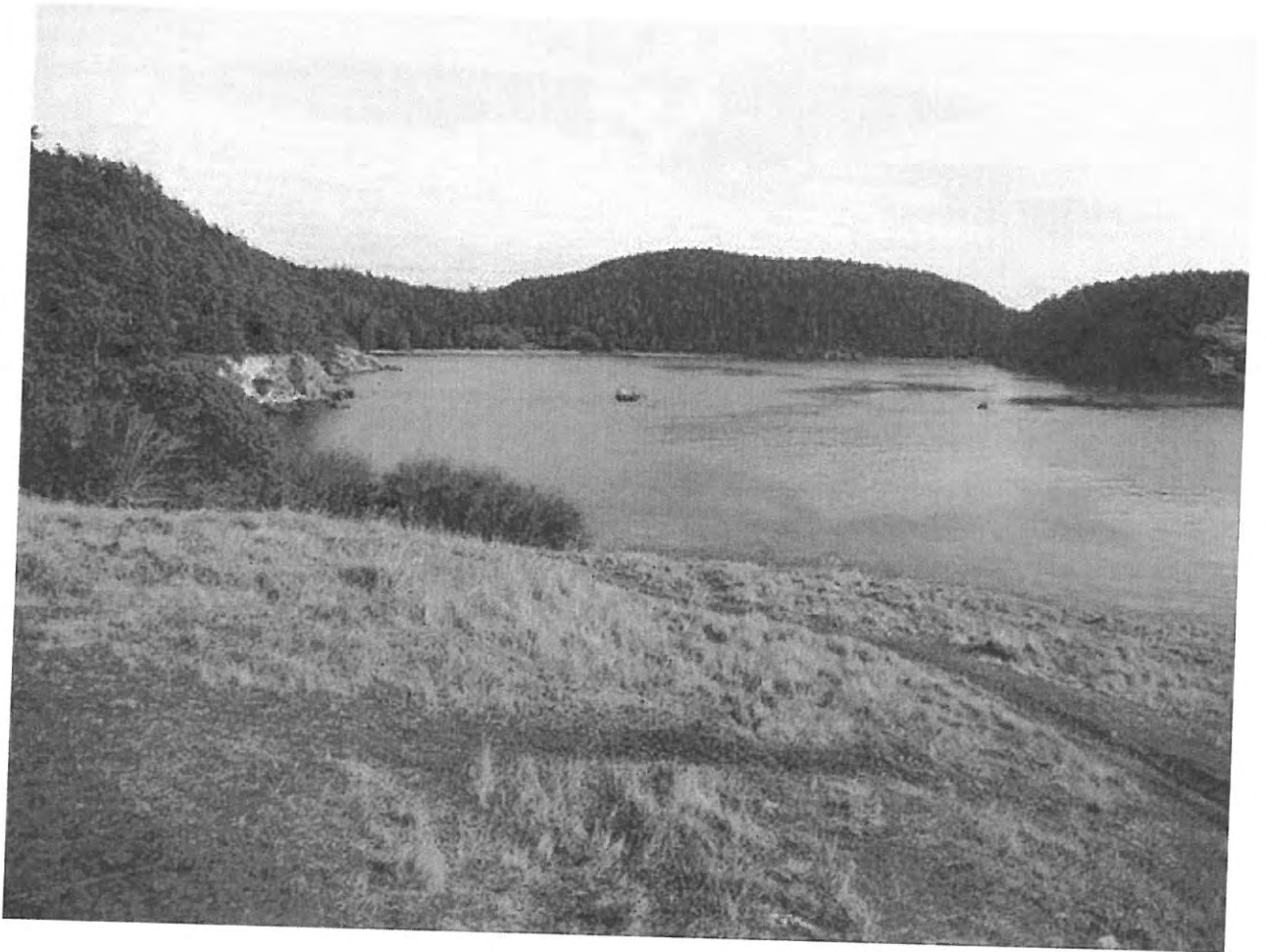
37

Nature & Wildlife Areas



By [emilyo825](#)

He was ecstatic to be able to take pictures with Max the wolf.



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-
-

5. Rosario Beach

80

Beaches



By SharonF-J

Look up tide tables so you can go at low tide if you plan to do the tide pools with kids.



-
-
-

2022

6. Anacortes Ferry

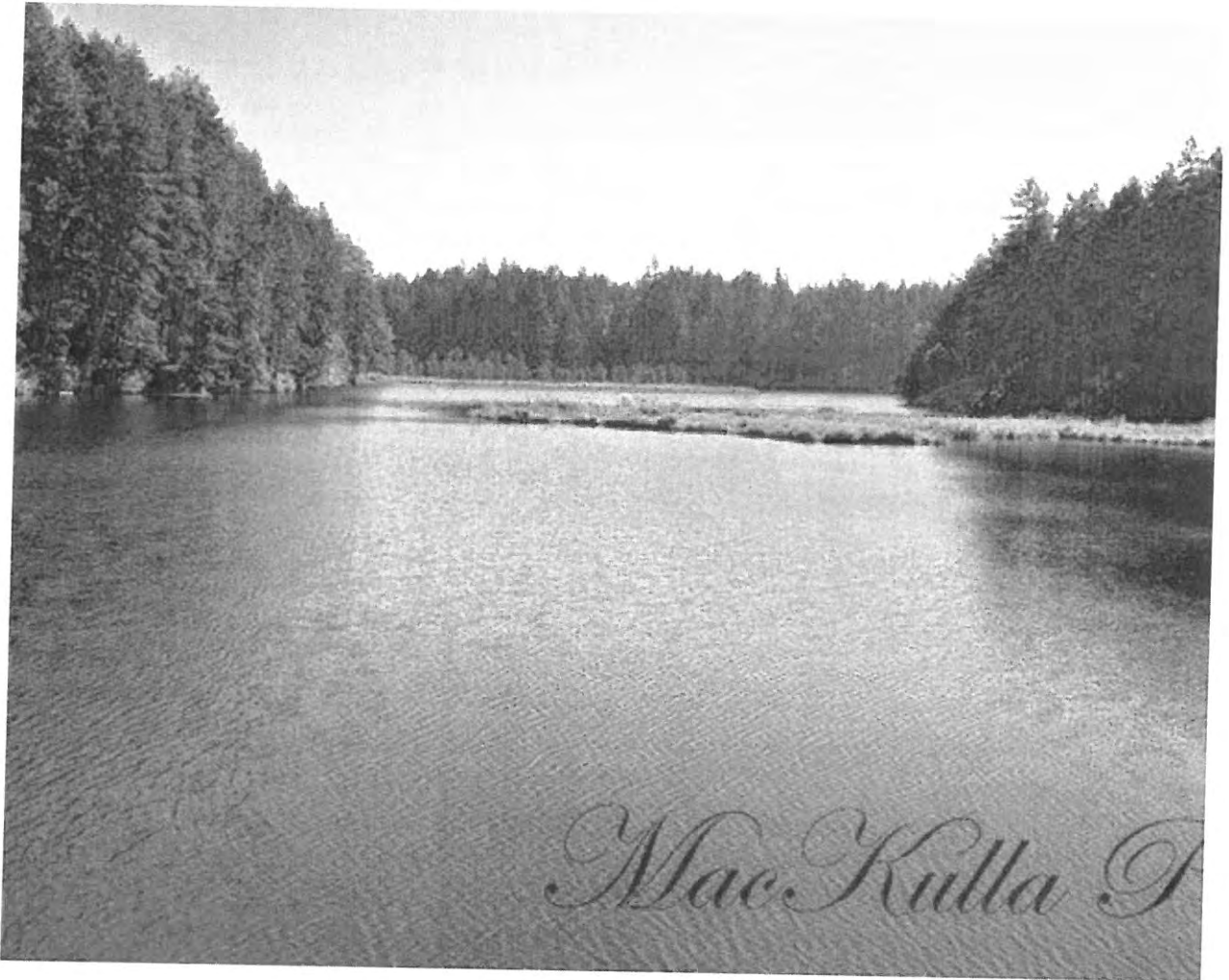
146

Ferries



By rcaldin

My wife and I go to orcas Island every couple years and use the ferry.



-
-
-

7. Cranberry Lake

39

Bodies of Water



By natureday.com

Mostly anyone can walk around the lake. Its so beautiful here. If you are in the area- go!



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-
-

8. Cape Sante Marina

44

Marinas



By [V6729EBbethm](#)

Stayed at the marina at the beginning and end of trip. This place is very professional. The staff is helpful, happy and...







9. Guemes Channel Trail

16

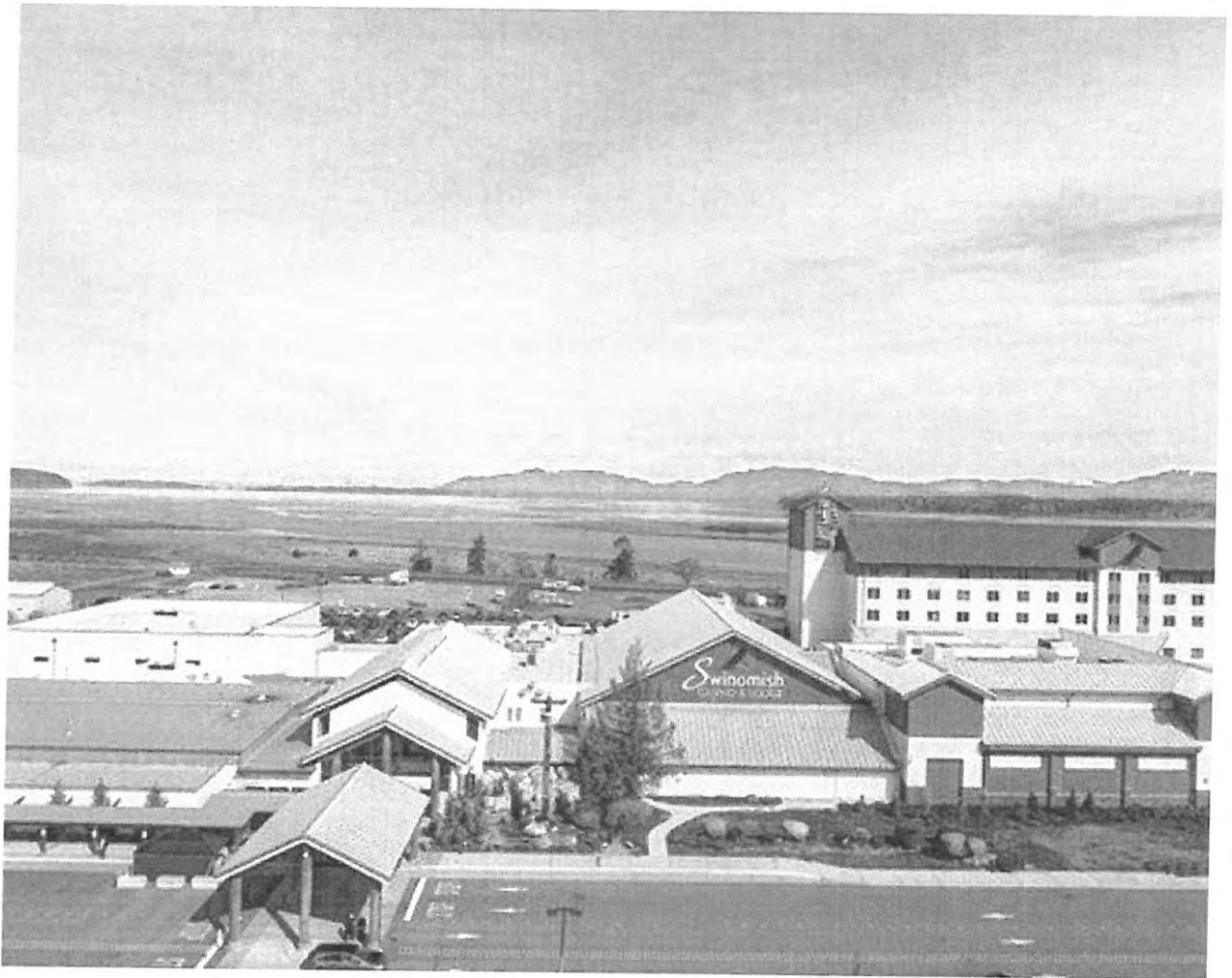
Biking Trails • Hiking Trails

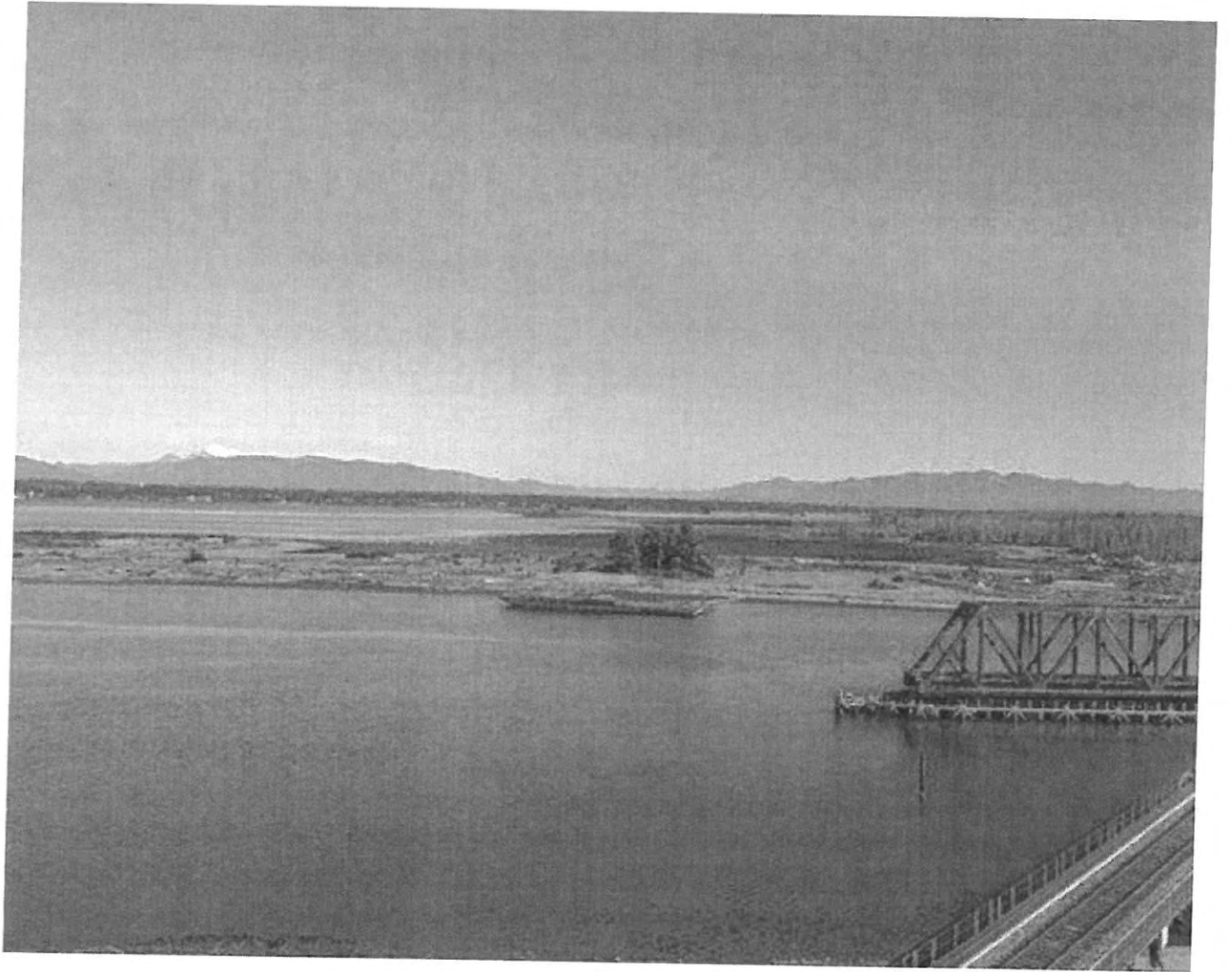


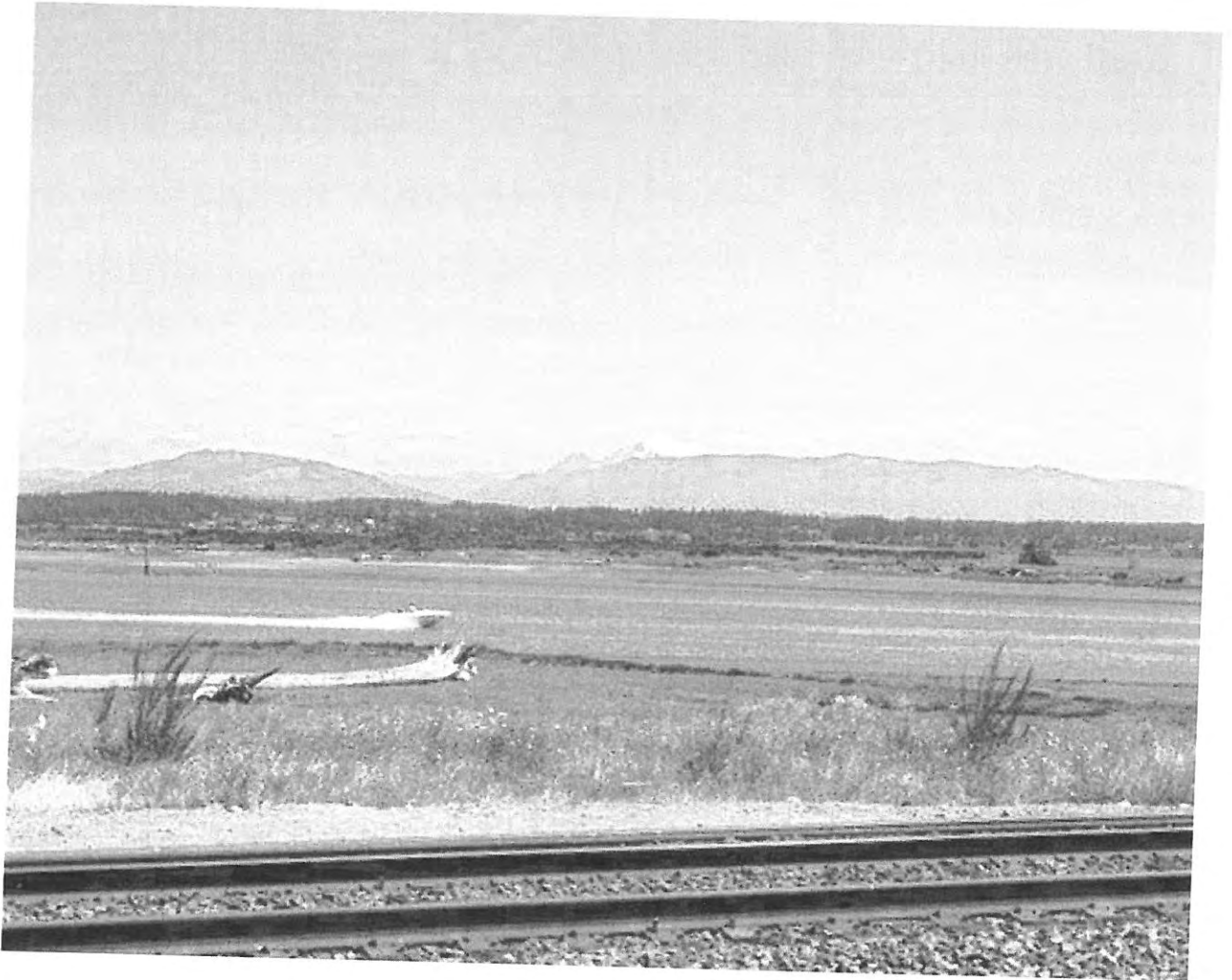
25

By Glo6053

If you are in line to catch the ferry you have an opportunity to stretch your legs.







10. Swinomish Casino & Lodge

181

Casinos

Open now



By [BigAl1943](#)

Great RV Park



-
-
-

11. Seafarers Memorial Park

19

Piers & Boardwalks

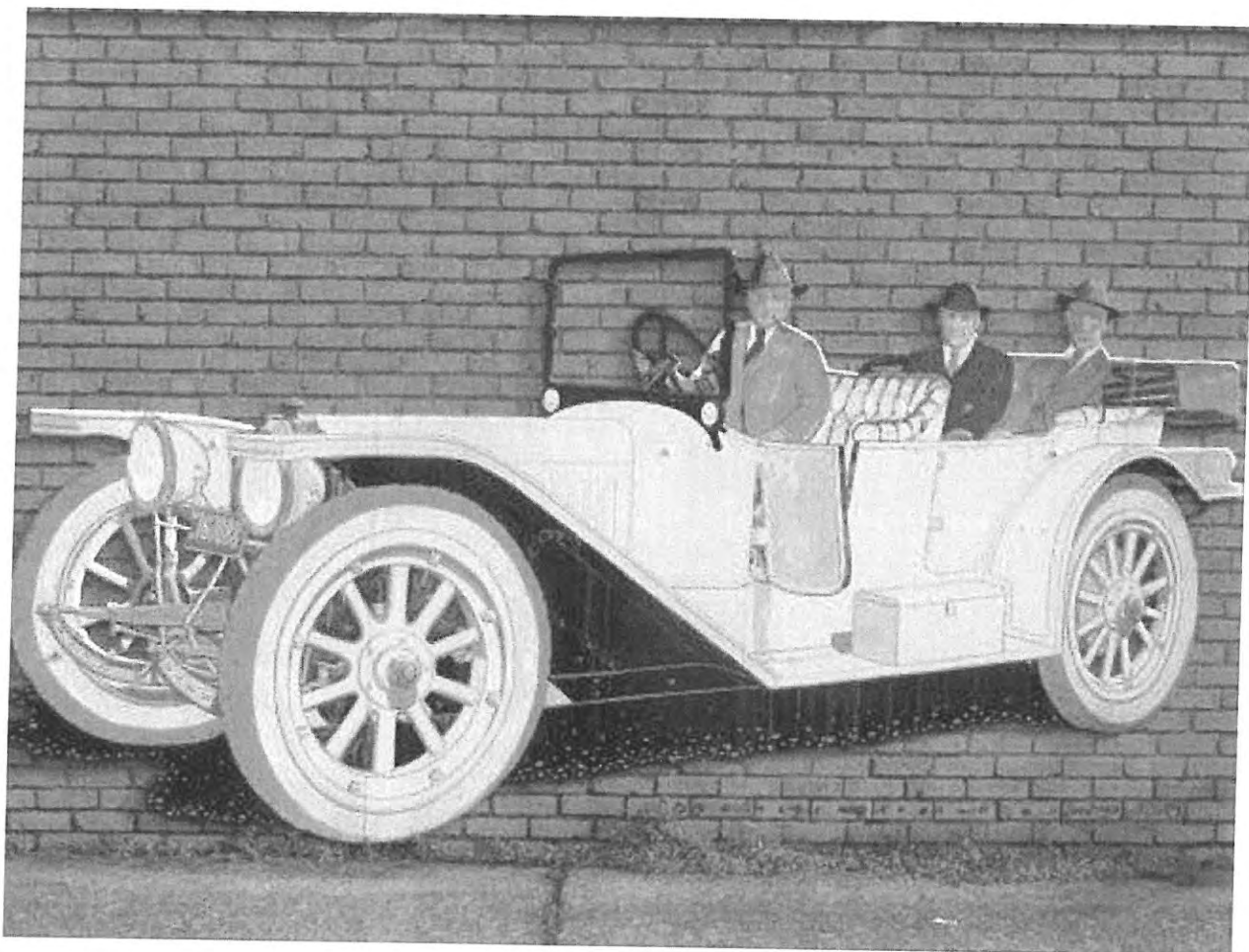


By [RobinV14](#)

It is a fun place to watch the boats entering and exiting the harbor.







12. Anacortes Farmer's Market

49

Farmers Markets

THIS ISLAND IS FULL OF FRIENDLY WOLVES AND YOU CAN VISIT IT



Jonas Grinevičius and Mindaugas Balčiauskas

Awoo! That's how wolves say, "Pet me, hooman." (Probably!) Are you itching to find out just how wolves talk to each other? Would you like to take a wolf for walkies in the woods? Do you want to find out just how soft these beautiful animals' fur *really* is? And have you ever wanted to learn how to howl directly from a wolf? Well then, we know the perfect place for you. (Not to mention us.)

The Predators of the Heart Sanctuary lets you have an *awoosome* 2-hour Wolf Encounter Experience. The animal sanctuary's located in Anacortes in the state of Washington near Seattle and right next to Vancouver past the Canadian border. So Americans and Canadians alike have a great opportunity to go running (or cuddling) with the wild animals. Scroll down for **Bored Panda's** interview about wolves with Clive Wynne, Professor of Psychology at Arizona State University and author of Dog is Love: Why and How Your Dog Loves You.

Dear Pandas, have any of you ever gone walking with wolves before? Perhaps you live near the wolf sanctuary? If so, drop us a comment and tell us about your experiences with these adorable animals.

More info: PredatorsOfTheHeart.com | [Facebook](#) | [Instagram](#) | [Twitter](#)

This post may include affiliate links.

You can go on an *awoosome* tour in the woods with wolves at the Predators of the Heart Sanctuary in the state of Washington



Image credits: [hi_incole](#)

The wolves are incredibly friendly. Keep in mind, they only have collars on when they pose for photos



Image credits: [lanabana007](#)

You can pet them and scratch their bellies



Image credits: [asiasiasia](#)

The animal rescue and preservation sanctuary only keeps animals that “find themselves without a place to live out their lives”

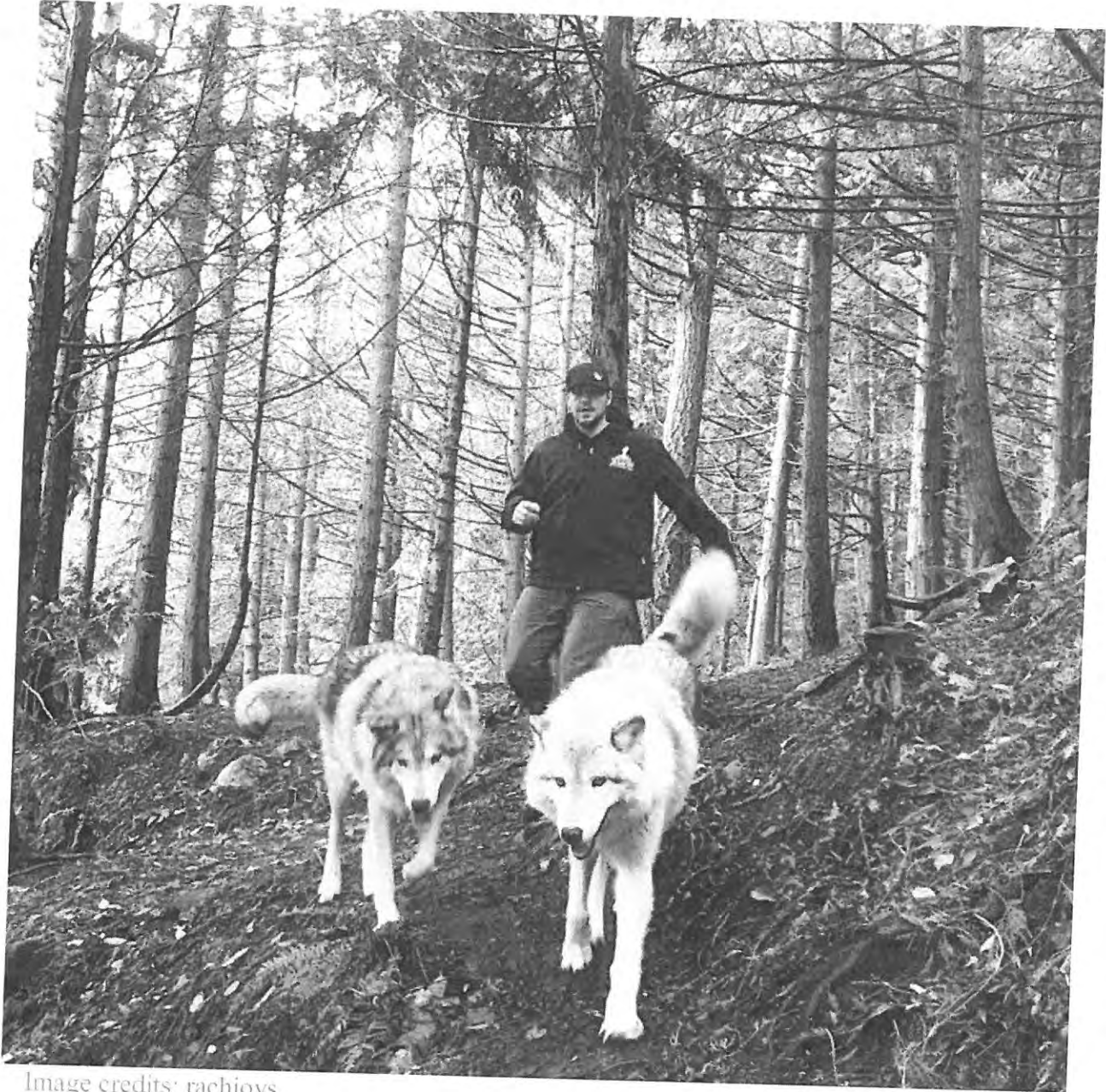


Image credits: [rachjoys](#)

According to professor Wynne from Arizona State University, most wolves do not usually act as friendly as those at the sanctuary in Washington. However, “a wild animal can, with skill and patience, be raised to be willing to react in a friendly way towards humans.” “People should always do some due diligence before taking a sanctuary’s word for it that their animals are harmless,” the professor pointed out.

We also wanted to know how well the global grey wolf population is thriving currently. Wynne pointed out that “wolves do OK in parts of the world where the human population is very sparse: places like Canada, Alaska, and Siberia.”

“But in most parts of the globe with a significant human population, wolves are in a difficult situation and will need continuous protection from and by people.”

The animal sanctuary lies between Seattle and Vancouver



Image credits: [Google Maps](#)

You can't just drop by to play with the wolves at the sanctuary. You have to book a guided tour with the wolves (don't worry, the guide's human... if it's not the full moon) through Airbnb for around 200 US dollars per person. [You can check the dates and the prices right here.](#) Usually, there are 2 tours a day, 6 days a week (the wolves get Sundays off!). And there's a waitlist. So your perfect day out with wolves will take some planning to get just right.

Posted in [Washington Attractions, Farms & Wildlife](#) August 23, 2022 by [Jessica Wick](#)

THE ONE-OF-A-KIND WILDLIFE CENTER IN WASHINGTON THAT'S LIKE A MINI ZOO

Washington is the perfect state for nature lovers, and that includes getting up-close-and-personal looks at the local wildlife. But luckily, you don't actually have to go out into the unpredictable wild to do so. Washington happens to have an incredibly well-run wildlife sanctuary not many people know about, and it's open to the public (with reservations). Predators of the Heart is a bit like a small zoo, but it's so much better.

Predators of the Heart is located in Anacortes, spanning 10 acres.



[Predators of the Heart / Facebook](#)

Founded in 1998, this sanctuary is insured and licensed by the USDA.

This place started out as a wolf sanctuary, and you'll find plenty of them on the property.



[MaBerry / TripAdvisor](#)

For whatever reason, the wolves that come here can't be reintroduced to the wild. So they live their lives here, safe and happy.

In addition to wolves, you'll see cougars, bobcats, birds of prey, numerous small mammals, and even reptiles.



[Abby / TripAdvisor](#)

The team here is dedicated to helping these animals have the best quality of life.

Another goal of the sanctuary is to educate children and adults about wildlife, using an approach that leads to an appreciation, affection, compassion, and respect for them.



[Predators of the Heart / Facebook](#)

You can do this by booking a two-hour Howling with Ambassadors Tour. During your tour, you'll meet Max and Kakoa and check out their new 1.4-acre enclosure.



[Predators of the Heart / Facebook](#)

You'll be able to take all the photos you want, and you're encouraged to touch and pet the sweet wolves.

Predators of the Heart is a fantastic organization that does so much good.



[Predators of the Heart / Facebook](#)

You can support them by donating money or simply by booking a tour (or both).

Doesn't this seem like an intriguing experience? You can support Predators of the Heart with a [donation](#), or treat yourself to a Howling with Ambassadors Tour on [Airbnb Experiences](#).

Address: Predators of the Heart / Wolf Encounters, 4709 Welch Ln, Anacortes, WA 98221, USA

Alligator Rescue for Pierce County Animal Control

<https://www.kiro7.com/news/south-sound-news/seizure-6-foot-plus-gator-living-tiny-tub-pierce-county-caught-camera/65NRKE36GJETDDKEA752KGOCWI/>

<https://www.kiro7.com/news/south-sound-news/seizure-6-foot-plus-gator-living-tiny-tub-pierce-county-caught-camera/65NRKE36GJETDDKEA752KGOCWI/>