

**EPCAL 8-Lot Major Subdivision Map
Town of Riverhead Community Development Agency
200 Howell Avenue
Riverhead, Suffolk County, NY 11901**

COMPREHENSIVE HABITAT PROTECTION PLAN UPDATE

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Introduction

This document is an Update to the Comprehensive Habitat Protection Plan (CHPP) dated February 2016. The CHPP had been prepared and developed in conjunction with the NYSDEC to mitigate potential impacts to the habitats of identified Endangered or Threatened species resulting from the proposed development of a the 50-Lot Subdivision, known as "Subdivision Map for Enterprise Park at Calverton," known as the Enterprise Park at Calverton (EPCAL) prepared by VHB, dated June 6, 2014, approximately 2,323.9 acres of land known as the Enterprise Park at Calverton (EPCAL) owned by the Town of Riverhead Community Development Agency.¹

Since the preparation of the CHPP, the Town of Riverhead and the Town Community Development Agency (the CDA), as the owner of EPCAL, determined that it was in the best interest of the Town to amend the 50-lot subdivision map to reflect division of the 2,323.9 acres the CDA owned into an 8-lot Subdivision of 2,106.69 acres)². Five of the lots (Lots 1, 2, 3, 4 and 5) would remain public-purposed lots and the other three (lots 6, 7, and 8), comprising approximately 1600 acres, would be lots offered for sale and future development by a third party. In November of 2018, the CDA, after requisite and extensive qualified and eligible hearings required under the Urban Renewal Law (General Municipal Law Articles 15 and 15-A), entered into a contract of sale to sell Lots 6, 7 and 8 to Calverton Aviation & Technology LLC, (CAT).

The areas and acreage for potential development of Lots 6, 7 and 8 of the 8-lot Subdivision mirror the areas and acreage for development depicted in the 50-Lot Subdivision described as Lots 1-50, excluding Lot #s 21, 42, 45, 46, 48 and 49. The following maps overlaying the identified habitats that have been studied in the CHPP onto the 8-lot subdivision are attached as Exhibits A (50-Lot Subdivision Areas under Supervision of Habitat Protection Plan; Exhibit B (8-Lot Subdivision Areas under Supervision of Habitat Protection Plan; and Exhibit C (8-Lot Subdivision with Areas under Supervision of Habitat Protection Plan with underlying ecological communities depicted/underlying areas of supervision).

In reviewing the CDA's application for a WSRR subdivision permit, the NYSDEC has requested that the CHPP be updated to reflect studies and mitigation measures

¹ The CHPP is Exhibit G to the FEIS. The FEIS is attached as Exhibit 2 to the CDA's application submittal.

² Note, the difference in acreage between the two subdivision maps reflects that United States Department of Navy parcels described as "Parcel A" and "Parcel B" totaling approximately 216.7 acres are under a remedial action program to address groundwater contamination and are not part of the proposed 8-Lot Major Subdivision Map. In addition, 4.9 acres and 12.69 acres proposed for Burman Boulevard right of way and dedication for highway purposes for Rt. 25 and Grumman Boulevard respectively are not included in the acreage for the 8 Lot subdivision.

included and made part of the FSGEIS and Findings Statement but not otherwise recited/updated in the CHPP appended to FSGEIS as "Appendix G", including, restrictions on clearing of woodland habitats for the Northern Long Eared Bat and an updated the field survey of the property to determine any evidence of the presence of two plant species know to provide food for the Frosted Elfin Butterfly. In addition to the above, the NYSDEC has requested the CDA to conduct a substantive review, summary or analysis of the potential use of the property for aviation (reflecting use of two runways FSGEIS and proposed 50-Lot Subdivision appended as "Appendix D" to FSGEIS versus one runway with reduced length set forth in DSGEIS and proposed 50-Lot Subdivision appended as "Appendix G" to DSGEIS) and impacts aviation use may have on EPCAL grassland birds³; and, aviation deicing procedures, protocol and mitigation measures to protect the ecological communities identified in the FSGEIS and CHPP. This Update will address each of the above items below.

RESTRICTIONS ON CLEARING OF WOODLAND HABITATS FOR THE NORTHERN LONG EAR BAT

Northern long-eared bats (NLEB), also known as Northern myotis, primarily forest-dependent insectivores, once frequently detected in the forests of every county of New York State, with the exception of the 5 counties of New York City, are now listed as "threatened" by the United States Fish and Wildlife Service (USFWS) under the federal Endangered Species Act on April 2, 2015 and as such, listed as "threatened" pursuant to New York Endangered Species Law and its implementing regulations, due to the rapid decline in population. The NLEB use a diversity of forest habitats for roosting, foraging and raising young, including, dense or loose aggregates of trees with variable amounts of canopy closure, early successional habitat with small diameter trees, and may include some adjacent and interspersed non-forested habitats, such as emergent wetlands and adjacent edges of old fields. While the dramatic population decline of the NLEB is reportedly due to the white-nose syndrome (WNS), a disease caused by an invasive fungus that ultimately causes affected hibernating bats to starve to death over the winter, and not limitation or removal of habitat unless there are potentially bats within the trees during the time they are harvested or otherwise removed from the landscape, there are recommended voluntary forest management measures to protect NLEB from unintentional harm.

While correspondence from the NYNHP indicates that no agency records currently exist for northern long-eared bat hibernacula or roost trees at or in the vicinity of the EPCAL site, the FSGEIS, Findings Statement and CHPP preserve approximately 787 acres of existing Pitch Pine-Oak forest and other forested habitat, with large contiguous blocks located to the north of the eastern runway, to the south of both

³ Initially, the 50-Lot subdivision plan provided for the western runway and the southern 3,000 feet of the eastern runway to be converted to grassland. During the review process of the 50-Lot subdivision, the FSGEIS revised the 50-Lot subdivision map by eliminating the proposed conversion of these runways, leaving them both available for aviation use.

runways and also within the lands comprising the CPB Core Preservation Area at the western portion of the EPCAL site, all representing potential summer roosting, breeding and foraging habitat for this species.

In addition, at any time development includes a proposal to clear any portion of forested habitat on the individual lots, a search, to wit: updated NYNHP record request, is required in order to determine if records exist for northern long-eared bat hibernacula or roosts. In the event records exist, consultations and/or permitting with the USFWS regarding the proposed clearing would be necessary if prohibited incidental take of northern long-eared bat would occur. As defined in the USFWS final 4(d) rule, incidental take of northern long-eared bat includes tree removal activities that occur within 0.25 mile of a known, occupied hibernacula or cutting or destroying a known, occupied maternity roost tree or other trees within a 150 foot radius from a maternity roost tree during the pup season from (June 1 through July 31). Any proposed activity that would result in prohibited incidental take of northern long-eared bat, as described above, would require USFWS consultation and/or permitting.

As stated above, there are recommended guidelines and voluntary forest management measures to protect NLEB from unintentional harm. This updated CHPP fully embraces and adopts those recommendations as part of the CHPP as recited below:

For projects requiring tree removal to convert forest habitat to another land use between April 1 and October 31 that are within 5 miles of an occupied hibernaculum or 1.5 miles of a documented summer occurrence, the following recommendations must be followed unless a permit is obtained from the Department (Department refers to NYSDEC).

November 1 to March 31

During this period of time, the NLEB are inactive and are within the hibernation sites.

- No cutting of any trees may occur within the ¼ mile buffer around a hibernation site.
- No activities that may result in disturbance to a hibernation site including, but not limited to, actions that would alter the hydrology, increase noise or introduce fill may occur.

Please note that planning any development or tree clearing activities within ¼ mile of a hibernation area for NLEB, applicants may be required to obtain a permit from the US Fish and Wildlife Service and the DEC.

For cutting of trees outside of the ¼ mile buffer around hibernacula:

No restrictions, with the following voluntary measures recommended:

- Leave uncut all known and documented roost trees, and any trees within a 150 foot radius of a documented summer occurrence.
- Leave uncut *all* snag and cavity trees unless their removal is necessary for protection of human life and property. For the purposes of this guidance,

protection of human life and property includes removal of trees that, if not removed, could result in the loss of electric service. Snag and cavity trees are defined under DEC Program Policy ONR-DLF-2 Retention on State Forests.

April 1 to October 31

During this period of time, NLEB are active and are within the forested landscape. The following restrictions are required unless a permit is obtained from the DEC:

- No cutting of any trees may occur within the ¼ mile buffer around a hibernaculum.

Please note that if planning any tree clearing activities within ¼ mile of a hibernation area for NLEB, applicants may be required to obtain a permit from the US Fish and Wildlife Service and DEC.

For cutting of trees in occupied NLEB habitat outside of the ¼ mile buffer around hibernacula or within 1.5 miles of a summer occurrence:

The following are restrictions that must be followed for forest management activities at this time of year:

- Leave uncut *all* snag and cavity trees unless their removal is necessary for protection of human life and property. For the purposes of this guidance, protection of human life and property includes removal of trees that, if not removed, could result in the loss of electric service. Snag and cavity trees are defined under DEC Program Policy ONR-DLF-2 Retention on State Forests.
- Leave uncut all known and documented roost trees, and any trees within a 150 foot radius of a documented summer occurrence.

Please note that if applicants plan any tree clearing activities within 150-ft of a summer occurrence for NLEB during June or July, applicants may be required to obtain a permit from the US Fish and Wildlife Service and DEC.

If any bats are observed flying from a tree, or on a tree that has been cut, forestry activities in the area should be suspended and DEC Wildlife staff notified as soon as possible.

If a project cannot follow the restrictions above, a permit from DEC under Part 182 would be required. Applications for incidental take permits are handled by regional Division of Environmental Permits offices. To be eligible for a permit, the project proponent must be able to demonstrate a net conservation benefit to NLEB as a result of their action. For information on how to apply, contact your regional DEC permit administrator.

This guidance is only intended to address NLEB protective measures. Additional regulations may apply to the land, including wetland and stream protection regulations and protective measures for other federal or state endangered species that may be present. Regional DEC staff in Division of Environmental Permits can help determine if any of these restrictions apply to the property and project in question.

Requirements for Projects That Do Not Result in a Change of Land Use within NLEB Occupied Habitat:

November 1 to March 31

During this period of time, the NLEB are inactive and are within the hibernacula.

- No cutting of any trees may occur inside of the ¼ mile buffer around a hibernaculum.

Please note that if any tree clearing activities are required within ¼ mile of a hibernation area for NLEB, you may be required to obtain a permit from the US Fish and Wildlife Service.

April 1 to October 31

During this period of time, the NLEB are active and will be found outside the hibernacula.

- Within 5 miles of known hibernacula or within 150' of documented summer occurrence the following cutting restrictions apply:
- Leave uncut *all* snag and cavity trees unless their removal is necessary for protection of human life and property. For the purposes of this guidance, protection of human life and property includes removal of trees that, if not removed, could result in the loss of electric service. Snag and cavity trees are defined under DEC Program Policy ONR-DLF-2 Retention on State Forests.
- Leave uncut all known and documented roost trees, and any trees within a 150 foot radius of a documented summer occurrence.

Please note that if applicants plan any tree clearing activities within 150 ft of a summer occurrence for NLEB during June or July, applicants may be required to obtain a permit from the US Fish and Wildlife Service.

If any bats are observed flying from a tree, or on a tree that has been cut, forestry activities in the area should be suspended and DEC Wildlife staff notified as soon as possible.

Within a ¼ mile of a hibernaculum, leave all trees uncut unless their removal is necessary for protection of human life and property.

Please note that if any tree clearing activities are required within ¼ mile of a hibernation area for NLEB, you may be required to obtain a permit from the US Fish and Wildlife Service.

If a project cannot follow by the restrictions above, a permit from DEC under Part 182 would be required. Applications for incidental take permits are handled by regional Division of Environmental Permits offices. To be eligible for a permit, the project proponent must be able to demonstrate a net conservation benefit to NLEB as a result of

their action. For information on how to apply, contact your regional DEC permit administrator.”

Based upon all of the above, all development requiring tree clearing shall adhere to the guidelines and recommendations above.

UPDATED FIELD STUDY FOR PRESENCE OF PLANT SPECIES PROVIDING FOOD FOR THE FROSTED ELFIN BUTTERFLY

In New York State the Frosted Elfin is listed as Threatened. There are two varieties of Frosted Elfins, one that feeds mostly on the flowers or seed pods of Wild Blue Lupine (*Lupinus perennis*), and another that feeds on leaves and stems of Wild Indigo (*Baptisia spp.*), primarily the native *Baptisia tinctoria* in New York.

Populations will feed on only of these plants or the other, even when both types of plants are present. Lupine feeders occur in the Albany area, western New York, and on Long Island, while Wild Indigo feeders occur on Long Island. Frosted elfins are not likely to be found in stands of foodplants that have been isolated for a long period of time. This species nearly always occurs in clusters of populations that function as meta-populations and small habitat patches may be unoccupied in some years.

On July 12, 2016 representatives from the NYSDEC (Robert Marsh, Biologist) and Town of Riverhead (Jeffrey Seeman, CEP) conducted field surveys to assess habitat conditions that would identify and or support host plants. The survey found suitable conditions but did not confirm presence of Wild Indigo or Wild Blue Lupine. The 2016 NYSDEC letter prepared by Robert Marsh, NYSDEC is included in the “Frosted Elfin Appendix.”

Although not within the recommended months to conduct field inspections for Wild Indigo and Wild Blue Lupine (generally late May through August), Jeffrey Seeman recently conducted a field survey on February 18, 2020 to verify existing conditions, and document physical changes since the July 12, 2016 survey. No significant changes were noted beyond the natural transition from grassland to shrubland. One area of particular interest, which demonstrated environmental conditions could support Wild Blue Lupine and Wild Indigo was located during the July 12, 2016 survey. This area is located along the northern portions of a shrub edge habitat at the south side of the 7,000-ft. taxiway, and south of its adjacent grassland. This area has remained largely unchanged.

As was recommended after the July 12, 2016 survey, it is further recommended that field surveys be conducted by qualified persons to inspect presence or absence of Wild Blue Lupine and Wild Indigo prior to any physical land development activity. The 2016 recommendation also included that if present within developable lot areas, transplanting Wild Indigo and/or Wild Blue Lupine to “Non-Disturbed Areas” (providing such areas have suitable conditions to support successful transplanting efforts) would serve as mitigating measures. The 2016 recommendation for mitigation continues to be

recommended as mitigation in order to support and encourage protection of the Frosted Elfin.

It is further suggested that the large White Tail Deer population at EPCAL may have significant adverse impacts on long term establishment of Wild Indigo and Wild Blue Lupine. One future consideration for restoration of Frosted Elfin habitat is the construction of a "sanctuary" enclosed in "deer fencing" and planted with Wild Indigo. A pilot program with along with field surveys and monitoring may offer opportunities to expand restoration efforts.

POTENTIAL IMPACTS ON EPCAL GRASSLAND BIRDS DUE TO CHANGES IN THE POTENTIAL USE OF THE EASTERN AND WESTERN RUNWAYS ON THE PROPERTY FOR NON-COMMERCIAL AVIATION

Grassland and grassland birds did not exist on the EPCAL site in the 1800's through and until the mid-1950. Instead, as reflected and more fully detailed in the analysis Grassland Birds and Aviation Use made part of Consistency Analysis Update, the EPCAL site was densely wooded (or referred to in the 1998 NEPA/FEIS study as "forested"). While there was evidence of dramatic decline in grassland bird species throughout the northeast during the 1950's through 1980's, with some species such as upland sandpiper, bobolink, dickissel, grasshopper sparrow, savannah sparrow, and Henslow's sparrow each declining by 94 to 98 percent with New York, upland sandpiper, grasshopper sparrow, vesper sparrow, and Henslow's sparrow listed as Species of Special Concern, the removal of the forest to make way for construction of the NWIRP, including, buildings and runways, created a new potential habitat for grassland birds. During operations, manufacturing of aircraft, testing of military aircraft manufactured on-site, together with testing of military aircraft manufactured off-site and testing of commercial aircraft at EPCAL, the newly created grasslands along the runways and taxiways with thousands of flights per year did attract a variety of grassland birds, including bobolink, grasshopper sparrows, meadowlark, vesper, and upland sandpiper.

While there exists some natural (i.e. Montauk Downs: Lee Kopplemen Nature Preserve and Montauk County Park;) and manmade grasslands (i.e. East Hampton Airport) on Long Island that boast large expansive tracts of grassland that serve as habitat for grassland birds, EPCAL has been identified by the NYSDEC and the Nature Conservancy (TNC) as the one of the last remaining potential habitats for grasslands birds offering large non-fragmented grasses with diversity of habitat (grassland, woodlands mature and young, wetlands) necessary to support a diversity of grassland birds, including eight avian species that are listed as Endangered, Threatened or Special Concern species in New York State. The disturbance that has maintained these grasslands and prevented succession to later ecological stages has been historic maintenance of the runway areas in the form of periodic mowing by Grumman as part of its effort to maintain "clear zones" or flight safety zones along the runways.

Currently, however, the grasslands are not actively managed, and there is no long-term management plan in place. In the absence of periodic management, colonization by shrub and tree species from surrounding wooded communities would result in succession

to later ecological stages (i.e., shrubland and forest) and the incremental loss of grasslands from the subject property, thus rendering the site unsuitable as habitat for grassland specialist birds.

The existing CHPP provides for a 583.0 acres of grassland habitat to be preserved on the area of EPCAL that now constitutes Lots 6, 7, and 8 of the 8-Lot Subdivision. If future development causes the loss of existing grassland habitat, new grassland habitat would have to be created so that at least 583.0 of grassland habitat will be ultimately preserved on what is now Lots 6, 7 and 8.⁴ To preserve this acreage as grassland habitat, the CHPP requires that these grassland habitats be actively maintained, as opposed to developing into shrublands and ultimately woodlands through the process of ecological succession that would occur in the absence of a maintenance plan.

Exhibit D (three map sections) highlights (pale green overlay) existing grassland habitats onto the proposed 8-Lot Subdivision. As can be seen from the Exhibit, the eastern and western runways and their associated taxi ways are adjacent to existing grassland habitats. As noted above, the 50-Lot subdivision plan provided for the western runway and the southern 3,000 feet of the eastern runway to be converted to grassland. During the review process of the 50-Lot subdivision, the FSGEIS revised the 50-Lot subdivision map by eliminating the proposed conversion of these runways, leaving them both available for noncommercial aviation use. The 8-Lot Subdivision likewise retains the two runways for potential future noncommercial aviation use.

Due to the runways and taxiways close proximity to grassland habitats, at the NYDEC's request, the applicant has undertaken a detailed study of the potential impacts on EPCAL grassland birds due to changes in the potential use of the runways on the property for non-commercial aviation. The study labeled "Grassland Birds and Aviation Use" examines and details the literature on this subject which has examined the potential impacts from noise and other disruptive factors on roosting, mating and The CDA's full study is contained in the SEQRA Consistency Analysis Update submitted herewith as Exhibit 13 at pages __ through __. This study details the literature on this subject matter that examined whether potential noise and other possible disruptive activities of at major airports have adversely impacted grassland birds populations.

As detailed in the CDA's study, as grassland habitats have been disappearing due to natural succession, airports have and continue to be a major provider of grassland habitats. As was the case when the runways at EPCAL when Grumman was in operation, airports maintain grassland to prevent growth of shrubs and trees that would interfere with their operations. There is evidence and ample studies that demonstrate the importance and key role grasslands at high traffic airports play in preservation, even population increases, in grassland birds. That these habitats continue to sustain grassland bird populations to flourish lead to the conclusion that these populations are not adversely affected by the noise associated with aircraft take-offs and landings. Indeed, the prior studies show that grassland habitats adjacent to runways support grassland bird's

⁴ This requirement is also incorporated in the SEQRA Supplemental Finding Statement (see page 48). The Findings Statement is Exhibit 4 to the Application submittals.

foraging, nesting and breeding are enabling population increases of the grassland birds designated as threatened, endangered and species of special concern.

These findings will apply equally, if not more so, to the grassland habitats adjacent to the eastern and western runways since it is beyond any doubt that that aviation use of the EPCAL property will never rise to the level of the major commercial airports or to the level when the property was owned by the Navy and operated by Grumman. Nor will the potential aviation at the EPCAL property that would be allowed once subdivided ever rise to the level contemplated in the post-Grumman reuse plans adopted by the Department of the Navy in conjunction with the transfer of the EPCAL property to the Town of Riverhead CDA.

In conclusion, to the extent that the 583 acres of grassland habitat required to be preserved on lots 6, 7, and 8 are located adjacent to the runways and taxi-ways, they will still provide a suitable habitat for the grassland birds.

As noted above, the CHPP's detailed requirements for maintaining the grassland habitat remain in full force and effect with respect to the 8-Lot Subdivision. As part of the approval process for any proposed development of Lots 6 and 7, the future developer will be required to provide suitable security to ensure that the grassland management plan will be maintained into perpetuity.

EPCAL PROPOSED RUNWAY/TAXIWAY DEICING PROCEDURES

The NYSDEC also requested that this Update address mitigating potential impacts deicing could have on the grassland and other habitats at EPCAL. The SEQRA Consistency Analysis Update submitted herewith provides a detailed analysis of potential impacts on the habitats from deicing and requires that any plan for development which includes an aviation use requiring or even potentially requiring use of deicing, shall require applicant to undertake supplemental environmental review to incorporate appropriate mitigating measures to avoid or minimize adverse impacts on habitats.

The following recommended protocols should be considered by a future developer if there is aviation use that requires deicing. The Consistency Analysis Update provides more details on deicing products and procedures in the section titled "EPCAL Proposed Aircraft Deicing Procedures."

The mitigating measures are recommended to avoid or minimize impacts to stormwater discharge receiving waters that support EPCAL's freshwater wetlands and or support eastern tiger salamander habitat and breeding areas. The proposed mitigation is offered in order of hierarchy with the most intensive method listed as item 6. The key component of this mitigation is water quality monitoring. The monitoring shall include establishing a baseline for existing conditions for specific chemical compounds and physical components at each of EPCAL's surface water resources. Albeit generic in nature these mitigating measures will require the NYSDEC establish threshold for surface water quality necessary to avoid disruption of eastern tiger salamander populations as well as other amphibians sensitive to changes in surface water chemistry.

1. Water Quality Monitoring Program if future developer intends to permit deicing: It is recommended that water samples be collected from the wetland areas to establish existing water quality. As a minimum, laboratory analyses should include volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, pesticides, electric conductivity, turbidity, and pH. This information can be used to establish a pre-development water quality baseline. Additional water quality samples should be collected and analyzed quarterly as a long term stormwater/freshwater wetland water quality monitoring program. The monitoring program would provide necessary information on what impacts deicing may or may not have on the freshwater wetlands and eastern tiger salamander habitats, and mitigating measures introduced to minimize or avoid adverse impacts. Guidance thresholds, action levels and required responses would be determined for specific EPCAL development, use(s) and locations within the site, to avoid and or minimize impacts to receiving water that support freshwater wetlands and eastern tiger salamander breeding.
2. Infrastructure Design: Infrastructure design shall comply with the NYSDEC guidance document for protection of eastern tiger salamander, especially engineered stormwater control and management systems along with parking field and roadway designs and their attendant drainage systems. These drainage designs require mitigating measures to control water quality that is discharged via the existing EPCAL infrastructure to freshwater wetlands. Additional control structures including sediment basins and diversion channels are anticipated along with bioengineered drainage swales and rain gardens. Emergency response plans must be included with engineered stormwater control/stormwater quality management plans to address potential for spills of industrial/commercially used compounds that may result in water quality impairment. Spill containment and diversion of stormwater to prevent conveyance to freshwater wetland habitats must be required.
3. Runway/Taxiway Winter Maintenance: Snow removal and placement of sand (for traction) at the 10,000 LF runway/taxiway areas would be permitted, but deicing by chemical treatments would cease.
4. Alfalfa Pellets: Alfalfa pellets can be used as deicing agents. It provides low concentrations of nitrogen, (similar to use of urea), with less environmental impact.
5. Runway/Taxiway Closure: To minimize and/or avoid adverse impacts to freshwater wetland and amphibians, especially tiger salamander breeding periods, protection of eggs and young offspring development: restrict use of the 10,000 LF runway and taxiways during ice events. The airport manager would provide a notice to aircraft that the runway is closed.

If a future developer intends to use deicing, but none of the above actions (or other actions adopted by the developer during the approval process) result in protecting water quality from deicing applications to an acceptable level, then use of the eastern runway/taxiway (10,000 LF) would be temporarily suspended due to ice. This procedure

will protect aircraft, aircraft crew, and water quality. Once the runway is determined safe for use and no deicing is required, the runway would be reopened.

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