



November 15, 2016

Suzanne Dietrick  
Case Manager, Land Use Management  
New Jersey Department of Environmental Protection  
Trenton, New Jersey

Re: Comment Gibbstown Logistics Center (Repauno Site) Greenwich Township, Gloucester County, NJ,  
NJDEP LOI # 0807-16-0001.1 for Delaware River Partners, LLC

Dear Ms. Dietrick,

Delaware Riverkeeper Network submits this comment and enclosed report by Schmid and Company on the above referenced permit application, NJDEP LOI # 0807-16-0001.1 for Delaware River Partners, LLC for the proposed Gibbstown Logistics Center. We have submitted comments and expert reports over the past few months on the record to the Department regarding the proposed project's several outstanding permit applications.

Delaware Riverkeeper Network is submitting this comment based on files we received through the Open Public Records Act and files available at the Greenwich Municipal Building for the wetlands permit applications. As you know, the Department issued a deficiency letter dated August 26, 2016 for the project's permit applications until more information was submitted by the applicant. We were informed that the comment period for the permits that were in process was being left open until the record was complete. Schmid and Company prepared a report based on the files that were available for three permit applications; Delaware Riverkeeper Network submitted those comments during the original comment period for the noticed permits.

Delaware Riverkeeper Network submits this comment and report on the LOI whether or not the LOI comment period is still considered officially open. Schmid and Company is not able to prepare a review of NJDEP # 0807-16-0001.2-FWW160001 and #0807-16-0001.2-FWW160002 due to the lack of information, inaccurate information and missing information in the LOI and other documents pertaining to these freshwater wetlands permits applications. Enclosed is a detailed review of the LOI documents and their deficiencies, explaining why revisions to the LOI information are needed to allow Schmid and Company to prepare comment on the freshwater wetlands permit applications that are still in review by the Department.

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Delaware Riverkeeper Network supports and endorses Schmid and Company's conclusions and recommendations that based on the inconsistencies, internal contradictions, and other poorly defined information in the LOI that the LOI drawings be revised and that the Department revise and reissue the LOI letter and that copies of that revised letter be made publicly available for review. These revisions are necessary in order for Schmid and Company to prepare an accurate assessment of the proposed project's impacts on the freshwater wetlands at this site.

Delaware Riverkeeper Network also inquires about the multiple freshwater wetland permits for this project. Our understanding of the regulations is that multiple permits are NOT allowed where an Individual Permit is required. Statewide General Permits often can be combined for a project up to the overall maximum limit of impact but multiple Individual Permits cannot be approved for a single project, nor can Statewide General Permits be used where an Individual Permit is necessary. The present set of applications seems to illegally piecemeal this project and misapply the required permitting.

Thank you for the opportunity to comment.

Sincerely,

Handwritten signatures in blue ink. The signature on the left is 'Maya van Rossum' and the signature on the right is 'Tracy Carluccio'.

Maya van Rossum  
the Delaware Riverkeeper

Tracy Carluccio  
Deputy Director

Attached: Schmid and Company Inc. report re. NJDEP LOI # 0807-16-0001.1 for Delaware River Partners, LLC dated October 14, 2106

**SCHMID & COMPANY INC., CONSULTING ECOLOGISTS**  
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14 October 2016

Maya K. van Rossum  
Delaware Riverkeeper Network  
925 Canal St., Suite 3701  
Bristol, Pennsylvania 19007

In re: NJDEP LOI # 0807-16-0001.1 for Delaware River Partners, LLC  
Gibbstown Logistics Center (Repauno Site)  
Greenwich Township, Gloucester County

Dear Ms. van Rossum:

Pursuant to your request we have reviewed certain information related to the above-referenced NJDEP Freshwater Wetlands Letter of Interpretation (LOI). In particular, we reviewed the text of the Line Verification LOI letter issued by the New Jersey Department of Environmental Protection (NJDEP) on 11 July 2016, and the LOI Amendment letter issued by NJDEP on 29 July 2016. We also reviewed a letter dated 27 May 2016 from Laura George (Ramboll Environ) to Brett Kosowski (NJDEP) providing revised information in support of the applicant's LOI application (6 page letter, without referenced attachments). Finally, we reviewed pdfs of a single set of 17 drawings related to the subject LOI that had been provided to you by the NJDEP separately from the LOI letters. The status of those drawings is unclear --- as discussed below, they appear to be preliminary interim drawings rather than the final verified survey drawings.

We understand that additional files and documentation associated with the LOI application, including the applicant's 18 July 2016 letter requesting clarification of the resource value classification (RVC) of various wetlands, have not yet been provided by NJDEP in response to your Open Public Records Act request. Our lack of those files compounds our difficulty in understanding precisely what the NJDEP confirmed at this site and the basis for its determinations. We offer the following comments based on the information currently available to us.

#### **General Comments**

- The LOI letter ambiguously identifies the subject property as:

Block(s)/ Lot(s): [8 / (current) 2, 3, 4.01, 4.02, and (current portions 1 and 4)]; (proposed) 4.08  
Greenwich Twp., Gloucester County

Many of the "verified" flag points, however, are located on other proposed lots, outside the LOI Boundary Limit according to the drawings. It is unknown whether the NJDEP collected any additional LOI fees for their review and verification of these offsite areas.

- The LOI verifies the surveyed limits of state open waters and freshwater wetlands, but it also appears to tacitly confirm or revise the unsurveyed boundaries of coastal wetlands transferred from maps promulgated under the Wetlands Act of 1970. In some places on this site those coastal wetland boundaries appear to have changed, and it is unclear whether those changes are a result of fill which was legally placed.

- Both the 11 July and the 29 July LOI letters contain the following language on page 1:

Based upon the information submitted, and upon site inspections conducted by Division staff on March 22<sup>nd</sup>, 2016 and April 13<sup>th</sup>, 2016, the Division has determined that the wetlands and waters boundary line(s) as shown on plan map sheets entitled: "PLAN OF WETLANDS AND TOPOGRAPHY, DRP GIBBSTOWN LOGISTICS CENTER No. 200 REPAUNO AVENUE, TOWNSHIP OF GREENWICH, GLOUCESTER COUNTY, NEW JERSEY", consisting of sixteen (16) sheets labeled Drawing No. W-2 through W-17, dated 12/29/2015, last revised on 06/08/2016, and prepared by Monarch Surveying & Engineering, are accurate as shown

This determination is specifically contradicted on pages 2, 3, and 4, where it is stated that more than 50 specific flag points denote lines that are "incorrectly labeled, not verified, and to be ignored".

- On page 6 of the LOI Amendment letter the Department states that the applicant can rely on this jurisdictional determination for "five years from the date of this letter", but that contradicts the statement on page 1 of the same letter which states that "the expiration date (5 years from [sic] the date of the original LOI) remains unchanged".

- The basis for classifying specific freshwater wetlands as having Exceptional or Intermediate resource value is not explained in the LOI letters, nor is it clear from the drawings reviewed.

- There are hand-lettered notations and hand-applied colored highlighting here and there on individual drawing sheets which are nowhere explained. Specific notations on several of the drawings refer to "Amendment 7/25", but that is not otherwise described.

- Drawings W-2 through W-17 each has an "Approved" stamp from the NJDEP-Division of Land Use Regulation, but there is no File number or approval date printed on or with the stamp.

- We question whether the drawings we received and reviewed (as pdfs provided by NJDEP) are the "official" LOI-verified drawings. Both the 11 July 2016 and the 29 July 2016 LOI letters state that the approved drawings were "prepared by Monarch Surveying & Engineering" and are "dated 12/29/2015, last revised on 06/08/2016". That suggests that the 29 July 2016 LOI Amendment does not involve any changes in any flag locations, but only in the Resource Value Classification (RVC) of some wetlands (as noted above, we had only one set of drawings to review). In our experience, the RVC of verified wetlands is listed in the LOI letter, and is not depicted on the drawings. If the RVC is depicted on the drawings, and especially if it has changed since a previous drawing was issued, the change typically is made to the drawing by the surveyor along with a formal revision date; it is **not** handwritten onto the surveyed drawing as has been done on the drawings we received from NJDEP.

- The LOI letter identifies, for each separate drawing, the specific flag point numbers that encompass State Open Waters, Coastal Wetlands, and freshwater wetlands by RVC applicable to that drawing. In many instances, the last item listed simply states that "all remaining wetland points" are

"Intermediate" (for example). That can, and does, create confusion regarding the "remaining" points --  
- it would be preferable, and more accurate, to list the specific flag point numbers that constitute those "remaining" ones.

- The LOI letter is not consistent in describing whether a listed series of points encloses a wetland area or encloses an upland within a wetland area. For example, for Sheet W-11, the LOI lists as Exceptional points DU4-1 thru DU4-14 without noting that that area is an upland and the Exceptional wetland is outside of it.

- There are numerous discrepancies and contradictions in the RVCs within the LOI letter itself, and also between the LOI letter and the drawings (whether surveyed or handwritten), as further detailed below.

### **Sheet W-1**

- The "Overall Plan" (Sheet W-1 of 17) provides an overview of waters and wetlands on the subject property at a design scale of 1 inch = 300 feet. Sheet W-1 is not stamped as "Approved" as are Sheets W-2 through W-17. It also is not referenced in the LOI letter. Sheet W-1 appears to represent an index map for the individual sheets that supply field-flagged boundary line numbers, but it inaccurately identifies the outline of many of the individual sheets. The amount of overlap between individual sheets is inconsistent and inaccurately shown on this index, and the standard convention of using "match lines" has not been used.

- This sheet provides 13 general "Notes" describing compilation from various sources and an inaccurate partial summary of regulated waters and wetlands, but none of those Notes is repeated on Sheets W-2 through W-17, although each of them refers to several of the Notes. A legend key is provided, the same as the legend key on the other sheets, but a separate Legend (showing features common to all sheets) is provided only on Sheet W-1. Also provided only on Sheet W-1 is a purported bearings and distances for a proposed Lot 4.08 encompassing 380.764 +/- acres within a much larger tract of land. Because this sheet has information relevant to each of the subsequent 16 individual sheets, but that information is not printed on them, this sheet likely should be confirmed by NJDEP and included as part of the LOI (after first being corrected as discussed above).

- The Delaware River is not shown as State Open Waters, contradicting several labels on this and on individual sheets. The "Area Within Waters of the United States" symbol is not readable on the paper print or color image of Sheet W-1. All State-regulated wetlands and State open waters are defined as Waters of the United States (NJAC 7:7A-1.4).

- Acreage entries in the Table of "Regulated Waters" areas are grossly incorrect in terms of NJAC 7:7A-1.4 definitions and not relevant to this LOI tract.

### **Sheet W-2**

- This sheet contains many sporadic hand-drawn notations and hand-applied colored highlights which are not certified by a licensed surveyor.

- The State Open Waters symbol from the legend is not used, but it is needed on this sheet.
- Points identifying Intermediate Value wetlands should be listed, not simply noted as "all remaining".

### **Sheet W-3**

- This sheet contains many sporadic hand-drawn notations and hand-applied colored highlights which are not certified by a licensed surveyor.
- The State Open Waters symbol from the legend is not used, but it is needed on this sheet.

### **Sheet W-4**

- This sheet contains many sporadic hand-drawn notations and hand-applied colored highlights which are not certified by a licensed surveyor.
- The State Open Waters symbol from the legend is used on some, but not on all State Open Waters as needed.
- The following points confirmed in the LOI letter are outside the LOI Boundary:
  - EL26 thru EL19
  - EL19 to DR134
  - DR134 thru 136
- Points identifying Intermediate Value wetlands should be listed, not simply noted as "all remaining".

### **Sheet W-5**

- This sheet contains many sporadic hand-drawn notations and hand-applied colored highlights which are not certified by a licensed surveyor.
- The LOI letter states that "DR-7 thru DR-35 was incorrectly labeled on the plan, this is to be ignored and is not verified", which contradicts the statement on page 1 that the plans are accurate as shown.
- Exceptional Value Wetland points AA-FW-3 thru AA-FW-6 are not shown on this sheet.
- The State Open Waters symbol from the legend is not used, but it is needed on this sheet.
- The following coastal wetlands apparently filled are not identified:
  - beyond points AE-119A and AE-120
  - between LOI Boundary and points DR-35 thru DR-49
- The following points confirmed in the LOI letter are outside the LOI Boundary:
  - DR14 thru DR18      (of these, as noted above, only DR-7 thru DR-35 presumably
  - DR23 thru DR49      are "to be ignored and are not verified").

- Points identifying Intermediate Value wetlands should be listed, not simply noted as "all remaining". At minimum, it should say "all remaining *freshwater* wetlands", because some of the remaining wetlands are coastal wetlands.

#### **Sheet W-6**

- This sheet contains many sporadic hand-drawn notations and hand-applied colored highlights which are not certified by a licensed surveyor.

- Exceptional Value Wetland point AJ 101 is not shown on this sheet.

- Flags of Wetland MB-W4 zig-zag across the ditch and are not connected consecutively as suggested in the LOI letter.

- Exceptional Value Wetland AJ is outside the LOI Boundary, and point AJ101 is not shown or labeled on this sheet.

- Points identifying Intermediate Value wetlands should be listed, not simply noted as "all remaining".

#### **Sheet W-7**

- This sheet contains many sporadic hand-drawn notations and hand-applied colored highlights which are not certified by a licensed surveyor.

- Ordinary Value Wetland point O17 is not labeled on this sheet.

- Ordinary Value Wetland PD-W2 is shown in more readable detail on "Inset A", but that inset is not on this sheet. Note should say "See Inset A on *Sheet W-8*".

- Likewise, the note for Inset D should say "See Inset D on *Sheet W-8*".

- Exceptional Value Wetland points DW3A-19 thru DW3A-21A should be added to the list in the LOI letter. Also, point DW3A-19 has only a hand-written label on this sheet.

- Points identifying Intermediate Value wetlands should be listed, not simply noted as "all remaining". At minimum, it should say "all remaining *freshwater* wetlands", because some of the remaining wetlands are coastal wetlands.

- Some labels on the drawings appear to contradict the LOI letter, or at least create confusion. For example, on this sheet Wetland N (points N1 thru N14) has a label "Drainage Ditch" which might suggest an ordinary resource value wetland, but it is not listed as Ordinary in the LOI letter and so presumably it is meant to be among the "all remaining" Intermediate wetlands. Similarly, "AF Basin" (points AF101 thru AF134) is identified in the LOI letter as an ordinary value wetland, but it is labeled on the drawing as "Permitted Waste Treatment System" which suggests it could be an unregulated feature.

### Sheet W-8

- This sheet contains many sporadic hand-drawn notations and hand-applied colored highlights which are not certified by a licensed surveyor.

- The following points confirmed in the LOI letter are outside the LOI Boundary:

SOW: EL8A to EL9

EL11 to EL13

EL25 to EL29C

Intermediate: W4-7 to W4-17

W7-3 to W7-8

Exceptional: EL5 to EL7 (handwritten notations on the drawing depict this as both Exceptional and Intermediate value, and the legend shows it as SOW)

- Points identifying Intermediate Value wetlands should be listed, not simply noted as "all remaining". At minimum, it should say "all remaining *freshwater* wetlands", because some of the remaining wetlands are coastal wetlands.

- The LOI letter states that "EL30 thru EL33 was incorrectly labeled on the plan, this is to be ignored and is not verified", which contradicts the statement on page 1 that the plans are accurate as shown.

- Were the former Coastal Wetlands now apparently filled, shown in Inset C, filled lawfully?

### Sheet W-9

- This sheet contains many sporadic hand-drawn notations and hand-applied colored highlights which are not certified by a licensed surveyor.

- Coastal wetland points AA100 thru AA100B confirmed in the LOI letter are outside the LOI Boundary.

- A single point (AE104A) does not define a wetland polygon -- the LOI letter should describe what this point connects with.

- Coastal wetland point AA106C is not labeled by the surveyor on this sheet.

- There is a box that says "See Inset B", but there is no such inset on this or any other sheet.

- Points identifying Intermediate Value wetlands should be listed, not simply noted as "all remaining". At minimum, it should say "all remaining *freshwater* wetlands", because some of the remaining wetlands are coastal wetlands.

- The LOI letter states that "DR2 thru DR18 was incorrectly labeled on the plan, this is to be ignored and is not verified", which contradicts the statement on page 1 that the plans are accurate as shown.



## Sheet W-10

- This sheet contains many sporadic hand-drawn notations and hand-applied colored highlights which are not certified by a licensed surveyor.
- Handwritten notations on drawings say Freshwater Wetland at DW3-158A, 161 to 161A is Exceptional Resource Value, but LOI letter lists it as Intermediate Resource Value. It is unclear if point DW3-158 is confirmed as part of this wetland (it is shown but not listed in the LOI letter for this sheet).
- The surveyor has not provided a label for Intermediate wetland point DW3-158A.
- Labels are missing for the following points: PMDA-W3-10, PMDA-W3-11, PMDA-W3-21, PMDA-W3-24, and PMDA-W3-28 thru -30.
- Points identifying Coastal wetlands should be listed, not simply noted as "all remaining".
- The following points confirmed in the LOI letter are outside the LOI:
  - Exceptional: AJ-100 thru AJ-106  
MB-W3-28 thru MB-W3-37
  - Ordinary: MB-W1-10
  - Coastal?: KW-1  
MB-W1-1 thru MB-W1-4  
MB-W1-14 thru MB-W1-16

## Sheet W-11

- This sheet contains many sporadic hand-drawn notations and hand-applied colored highlights which are not certified by a licensed surveyor.
- Handwritten symbols on the sheet show Freshwater Wetland at DW3-116A through 118 as Exceptional Resource Value, but LOI letter lists it as Intermediate Resource Value.
- The handwritten notations and symbols are not always consistent. In some places, large triangles are hand-drawn over the flag points to identify a point as belonging to an Exceptional Value wetland (*e.g.*, DW3-27 thru DW3-40 and DW3 60 thru DW3-73), but in other places a note is written in the middle of the wetland that all of the points are considered Exceptional Value (*e.g.*, PMDA-W4-01 thru PMDA-W4-25).
- Freshwater Wetland points DW3-159 to -158A, and 162B are listed as Exceptional in the LOI letter for this sheet, but were listed as Intermediate on Sheet 10.
- The surveyor has not provided a label for wetland point DW3-158A.
- A single point (DW3-162B) does not define a wetland polygon -- the LOI letter identifies this point as Exceptional Value, but it is unclear from both the LOI letter and the drawing what this point connects with.
- When flag numbers are not consecutive on a given sheet, the LOI should not list them as though they are: The LOI letter states that DW3-53 thru DW3-27 are Exceptional value, but there is a large gap in

these numbers (there are no points DW3-51 through DW3-40) on this sheet). If the LOI letter is going to list points sheet by sheet, then it should only identify the points actually shown on a given sheet.

- The former coastal wetlands at DW3A-16C, 16D, 17, 17B, 17C; at PMDA-W2-36A, 37, 38, 38A; and at PMDA-W2-33, 34, 34A now apparently are filled.

- Points identifying coastal wetlands should be listed, not simply noted as "all remaining".

### **Sheet W-12**

- This sheet contains many sporadic hand-drawn notations and hand-applied colored highlights which are not certified by a licensed surveyor.

- The former coastal wetlands northeast of DW3A-25, 26, 27, 28, 29, 29A, 29B, 29C, 29D, 30, 31, 31A, 32 and south of CLR27 now apparently are filled.

- The promulgated coastal wetlands boundary apparently is being revised to identify filled land at DW3A-72, 72A, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 89A.

- Handwritten notations are contradictory and confusing: point EL5, 6, and 7 have Exceptional Value notations, but are labeled Intermediate on one side and SOW on the other. These points also are outside the LOI Boundary. Points EL 32, EL33, and EL34 also are outside the LOI Boundary.

- Part of the AQ Wetland is listed as Exceptional (AQ93 thru AQ103) and part is Intermediate (AQ103 thru AQ105), but it is unclear what causes the change in RVC within the same wetland. Also, part of Wetland AQ is outside the LOI Boundary (AQ93 thru AQ95).

- Other wetland points that are outside the LOI Boundary include: W4-7 to W4-8, AX100 to AX103, AX106 to AX107, AT99 to AT103, and AT128 to AT130.

- Exceptional wetland point DW3-22 is missing from the sheet, as is its label.

- LOI letter listing of Exceptional value points DW3A-31A thru DW3A-72A should actually start with DW3A-31 (rather than DW3A-31A).

- The LOI letter states that "EL32 thru EL35 was incorrectly labeled on the plan, this is to be ignored and is not verified", which contradicts the statement on page 1 that the plans are accurate as shown.

- Points identifying coastal wetlands should be listed, not simply noted as "all remaining".

### **Sheet W-13**

- This sheet contains many sporadic hand-drawn notations and hand-applied colored highlights which are not certified by a licensed surveyor.

- There are major discrepancies between this sheet and Sheet W-14 where they overlap (and the overlap is significantly more than any other two sheets).

- Resource Value Classification as Exceptional directly contradicts classification as Intermediate on Sheet W-14 for DW3-148 through DW3-154F; DW3-141 through 147I; DW3-118 through 140G; DW3-105 through DW3-92; and DW2A-1 through DW2A-5, DW2A-5 through DW2A-27a, DW2A-27a through DW2-31.
- Conversely, Resource Value classification as Intermediate on this sheet directly contradicts classification as Exceptional on Sheet W-14 for DW3-160 through DW3-158A.
- The following points are outside the LOI Boundary:
  - AP110 to AP119 to MW-3 to WM-1
  - LW-13 to LW-2
  - KW1 to KW7
  - NW-1 to NW-4
  - MB-WI-16
- Points identifying coastal wetlands should be listed, not simply noted as "all remaining".

**Sheet W-14**

- This sheet contains many sporadic hand-drawn notations and hand-applied colored highlights which are not certified by a licensed surveyor.
- This sheet is located to the *east* of Sheet W-13, yet it shows more detail to the *west* (and outside of the LOI Boundary) than is shown on Sheet W-13. There are numerous conflicts with RVC between this sheet and Sheet W-13, as listed above.
- For Exceptional Resource Value Classification, DW3-72 through DW3-78 apparently should be through DW3-79.
- For Intermediate Resource Value Classification DW3-76 apparently should be DW3-79 through DW3-105.
- The flag location and part of the label are missing for wetland points DW3-45T and DWS-45M, and the flag location and label are missing for DWS-45L (all of which are listed in the LOI letter for this sheet).
- Points identifying coastal wetlands should be listed, not simply noted as "all remaining".

**Sheet W-15**

- This sheet contains many sporadic hand-drawn notations and hand-applied colored highlights which are not certified by a licensed surveyor.
- The following verified flag points are outside the LOI Boundary depicted on drawing:
 

AR102 to AR107	X1 to X7
AS100 to AS105	Y1 to Y8
AS112 to AS114	Z2 to Z4

- The label is missing for Exceptional RV wetland point DW3-450 and partly for point AS101.
- Handwritten notes on wetland DW2 (points DW2-4M thru DW2-8) label it both as "Exceptional" and as "IRV per amendment 7/25"; the LOI letter lists it as Intermediate.

#### Sheet W-16

- This sheet contains sporadic hand-drawn notations and hand-applied colored highlights which are not certified by a licensed surveyor.
- Exceptional RV wetland flag points listed in the LOI letter all are outside the LOI Boundary.
- RVC is not stated for adjacent freshwater wetlands WL-A5 through WL-A26 verified in LOI 0807-07-0002.1 (January 2013).
- Points identifying Intermediate Value wetlands should be listed, not simply noted as "all remaining".

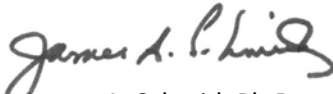
#### Sheet W-17


- This sheet contains hand-applied colored highlights which are not certified by a licensed surveyor.
- Points identifying Intermediate Value freshwater wetlands should be listed; instead the LOI letter says "All wetland points" are Intermediate, which clearly is wrong because it also lists some Exceptional Value wetland points. At minimum it should say "All *remaining freshwater* wetland points".

Based on the inconsistencies, internal contradictions, and other issues identified above we recommend that the LOI drawings be formally revised by the surveyor to accurately display the information which NJDEP has verified. Furthermore, we recommend that the LOI letter be revised and reissued by NJDEP and that copies of the revised drawings and reissued LOI letter be provided to Gloucester Township and made available to the public. These revisions must be made prior to any evaluation of any permit applications for this site.

Please let us know if you have any questions about any of the above.

Yours truly,

  
James A. Schmid, Ph.D.  
President

  
Stephen P. Kunz  
Senior Ecologist

cc: Tracy Carluccio