



COLORADO
Division of Reclamation,
Mining and Safety
Department of Natural Resources
1313 Sherman Street, Room 215
Denver, Colorado 80203

February 6, 2023

Steve O'Brian
Environment Inc.
7985 Vance Dr #205A
Arvada CO 80003

**Re: Preliminary Review of a 112c Construction Materials Reclamation Permit Application Package,
L.G. Everist – West Farm Reservoirs, File M2022-048**

Mr. O'Brian:

The Division of Reclamation, Mining, and Safety has completed its preliminary adequacy review of your 112 construction materials reclamation permit application. The application was called complete for review on November 30, 2022. All comment and review periods began on November 30, 2022. **The decision date for this application is February 28, 2023. Please be advised that if you are unable to satisfactorily address any concerns identified in this review before the decision date, it will be your responsibility to request an extension of the review period. If there are outstanding issues that have not been adequately addressed prior to the end of the review period, and no extension has been requested, the Division will deny this application. In order to allow the Division adequate time to review your responses to any adequacy issues, please submit your adequacy responses to the Division no later than one week prior to the decision date (February 21, 2023).**

Please note that any changes or additions to the application on file in our office must also be reflected in the public review copy, which has been placed with the Weld County Clerk and Recorder.

The review consisted of comparing the application content with specific requirements of Rule 6.1, 6.2, 6.4 and 6.5 of the Minerals Rules and Regulations of the Colorado Mined Land Reclamation Board for the Extraction of Construction Materials. As with most applications, there are items that will require clarification of the existing information. Any inadequacies are identified under the respective exhibit heading and have been numbered to assist in tracking responses during the review process.

APPLICATION FORM:

- *Adequate as submitted*

6.2 GENERAL REQUIREMENTS OF EXHIBITS

6.2.1 General Requirements

(1) This Rule provides for the guidelines for, and information requirements of, each Exhibit required to be submitted with the permit application, as specified according to Section 6.1.



(2) Maps and Exhibits Maps, except the index map, must conform to the following criteria:

- (a) show name of Applicant;
- (b) must be prepared and signed by a registered land surveyor, professional engineer, or other qualified person;
- (c) give date prepared;
- (d) identify and outline the area which corresponds with the application;
- (e) with the exception of the map of the affected lands required in Section 34-32.5-112(2)(d), C.R.S. 1984, as amended, shall be prepared at a scale that is appropriate to clearly show all elements that are required to be delineated by the Act and these Rules. The acceptable range of map scales shall not be larger than 1 inch = 50 feet nor smaller than 1 inch = 660 feet. Also, that a map scale, appropriate legend, map title, date and a north arrow shall be included.

EXHIBIT A - Legal Description (Rule 6.4.1): The legal description must identify all affected land and be wholly adequate for field location of the property. It can be in the form of metes and bounds survey or a description by reference to township, range and section to at least the nearest quarter/quarter section. Where applicable, the street address or lot numbers may be used.

- *Adequate as submitted*

EXHIBIT B - Index Map (Rule 6.4.2): An index map showing the regional location of all affected land and all roads and other access to the area. A standard U.S. Geological Survey topographic quadrangle or equivalent is acceptable. Scale criteria need not be followed for this map.

- *Adequate as submitted*

EXHIBIT C - Pre-mining and Mining Plan Map(s) of Affected Lands (Rule 6.4.3): One or more maps may be necessary to legibly portray the following information:

- (a) all immediately adjacent surface owners of record;
- (b) the name and location of all creeks, roads, buildings, oil and gas wells and lines, and power and communication lines on the area of affected land and within two hundred (200) feet of all boundaries of such area
- (c) the existing topography of the area with contour lines of sufficient detail to portray the direction and rate of slope of the affected land;
- (d) the total area to be involved in the operation, including the area to be mined and the area of affected lands (see definition of "Affected Land");
- (e) the type of present vegetation covering the affected lands; and

- (f) in conjunction with Exhibit G - Water Information, Subsection 6.4.7, if required by the Office, further water resources information will be presented on a map in this section.
- (g) Show the owner's name, type of structures, and location of all permanent or man-made structures contained on the area of affected land and within two hundred (200) feet of the affected land.
- (h) In conjunction with Exhibit I - Soils Information, Subsection 6.4.9, soils information may be presented on a map in this section;
- (i) Aerial photos, if available, may be included in this section.
- 1) Parcels owned by LG Everist and Town of Platteville within 200' of the eastern permit boundary have not been identified with other adjacent property owners on the current existing conditions map – please revise as needed.*
 - 2) Information for structures within the permit and within 200' of the permit as listed on Exhibit C-1 Mining Plan Map should be identified on the provided Exhibit C-2 Structures Map. All structures listed should be identified on this map so that they may be correlated to the correct structure owner.*
 - 3) The surface drainage corridor which conveys irrigation return flows from the adjacent property to the south, back to the South Platte River, as observed during the pre-operational inspection, has not been shown on the existing conditions map – Please revise as needed.*
 - 4) No description of existing vegetation has been provided as required by (e).*
 - 5) Please show the location of the 50 acre Plant Site as described on the Mining Plan Map, including the location of the gravel washing/processing area, concrete batch plant, asphalt plant and recycling facility. Sufficient detail will need to be provided for these facilities so that an accurate bond for removal and reclamation can be calculated.*
 - 6) Please show the locations and expected volumes of the topsoil and overburden stockpiles on the Mining Plan map. Please note that the rule requires segregation of Topsoil from Overburden and that the topsoil be maintained for use in reclamation. Stockpiles located within the floodplain should be oriented parallel to flood flows.*

EXHIBIT D - Mining Plan (Rule 6.4.4): The mining plan shall supply the following information, correlated with the affected lands, map(s) and timetables:

- (a) description of the method(s) of mining to be employed in each stage of the operation as related to any surface disturbance on affected lands;
- (b) earthmoving;
- (c) all water diversions and impoundments; and
- (d) the size of area(s) to be worked at any one time.
- (e) An approximate timetable to describe the mining operation. The timetable is for the purpose of establishing the relationship between mining and reclamation during the different phases of a mining operation. You will not be required to meet specific dates for initiation, or completion of mining in a phase as may be identified in the

timetable. This does not exempt you from complying with the performance standards of Section 3.1. Such timetable should include:

- (i) an estimate of the periods of time which will be required for the various stages or phases of the operation;
 - (ii) a description of the size and location of each area to be worked during each phase; and
 - (iii) outlining the sequence in which each stage or phase of the operation will be carried out.
- (Timetables need not be separate and distinct from the mining plan, but may be incorporated therein.)
- (f) A map (in Exhibit C - Pre-Mining and Mining Plan Maps(s) of Affected Lands, Subsection 6.4.3) may be used along with a narrative to present the following information:
- (i) nature, depth and thickness of the ore body or deposit to be mined and the thickness and type of overburden to be removed (may be marked "CONFIDENTIAL," as per Paragraph 1.3(3)); and
 - (ii) nature of the stratum immediately beneath the material to be mined in sedimentary deposits.
- (g) Identify the primary and secondary commodities to be mined/extracted and describe the intended use; and
- (h) name and describe the intended use of all expected incidental products to be mined/extracted by the proposed operation.
- (i) Specify if explosives will be used in conjunction with the mining (or reclamation). In consultation with the Office, the Applicant must demonstrate pursuant to Rule 6.5(4), Geotechnical Stability Exhibit, that off-site areas will not be adversely affected by blasting.
- (j) Specify the dimensions of any existing or proposed roads that will be used for the mining operation. Describe any improvements necessary on existing roads and the specifications to be used in the construction of new roads. New or improved roads must be included as part of the affected lands and permitted acreage. Affected land shall not include off-site roads which existed prior to the date on which notice was given or permit application was made to the office and which were constructed for purposes unrelated to the proposed mining operation and which will not be substantially upgraded to support the mining operation. Describe any associated drainage and runoff conveyance structures to include sufficient information to evaluate structure sizing.

- 7) Please describe in detail, and show on the mining plan and reclamation plan maps, how irrigation return flow from the adjacent property to the south will be preserved/conveyed to the South Platte River during and after mining of Phase 1.**
- 8) If two different types of reclamation will be utilized to achieve the final interior reservoir slopes of 3H:1V (backfill from ½H:1V to 3H:1V vs. cut/fill) you will need to clearly specify on the mining and reclamation plan maps where each of these methods will be used and what the required bench width will be where cut/fill is proposed. Please also remove the statement on P22 about mining to final slopes if this is not the proposed plan.**
- 9) The last sentence on P13 states that "...the responsibility for weed control and agricultural area maintenance is retained by the landowners". Please remove this statement. Weed control, site maintenance, and accountability for other activities occurring within the permit area, is the responsibility of the permittee. This statement will also need to be removed from P21**

- 10) *Changes to the mining sequence shown in the provided plan will need to be approved through the Technical Revision process – please acknowledge.*
- 11) *The operator will be required to remove all constructed berms unless otherwise specified in the reclamation plan during final reclamation – please acknowledge.*
- 12) *Please provide USACE documentation supporting the statement on P14 of the provided mining plan, as well as in Exhibits J and M, that no jurisdictional wetlands are present on the site. This statement also seems to conflict with the following sentence which states that the irrigation return flow ditch on the west side of Phases 1 and 2 IS jurisdictional and must remain. Please clarify.*

Comments 13-16 are based on the guidance provided by the Urban Drainage and Flood Control District - Technical Review Guidelines for Gravel Mining and Water Storage Activities Within or Adjacent to the 100 Year Floodplain.

- 13) *From section 2.6.1: “When the river is allowed to maintain an existing unstable alignment, and no bank protection is provided beyond the necessary revegetation, the minimum allowable top width of riverside berms will be 400 feet. This is the maximum setback requirement imposed on gravel mining operators.” “When the river is left in an existing unstable alignment and no riverbank protection is provided, but pitside slope protection is provided in accordance with the requirements of Section 2.4—Pitside Bank Protection, the allowable minimum top width will be 300 feet.” Please adjust the mining setbacks shown for Phase 2 to be a minimum of 300 feet from the river.*
- 14) *For Phase 1, no pitside slope protection has been proposed, therefore, please adjust the mining setback from the river to be no less than 400’. If you wish to use a 300’ setback for Phase 1, provide pitside slope protection in the mining and reclamation plans for that phase.*
- 15) *Due to the immediate and direct connection between the irrigation return flow ditch on the west side of Phases 1 and 2 and the South Platte River, the west sides of the Phase 1 and 2 reservoirs should also have pitside slope protection in areas where they are adjacent to this ditch. Please revise mining and reclamation plans as needed.*
- 16) *The area between Phase 1 and Phase 2 containing County Road 32.5 is considered by DRMS to be a “Type B Lateral Berm” as described in section 2.5.2. As such, the minimum berm widths given in sections 2.7.2.1 and 2.7.2.2 will apply. These are: 350 feet minimum width for an unprotected berm, and 200 feet minimum width if the berm is protected in accordance with the requirements of section 2.5.3. (The current 160’ width proposed is well below the requirement for either scenario) Please modify the mining and reclamation plans accordingly to reflect these setback requirements.*

EXHIBIT E - Reclamation Plan (Rule 6.4.5):

(1) In preparing the Reclamation Plan, you should be specific in terms of addressing such items as final grading (including drainage), seeding, fertilizing, revegetation (trees, shrubs, etc.), and topsoiling. You are encouraged to allow flexibility in your plans by committing to ranges of numbers (e.g., 6"-12" of topsoil) rather than specific figures.

(2) The Reclamation Plan shall include provisions for, or satisfactory explanation of, all general requirements for the type of reclamation proposed to be implemented by you. Reclamation shall be required on all the affected land. The Reclamation Plans shall include:

- (a) A description of the type(s) of reclamation you propose to achieve in the reclamation of the affected land, why each was chosen, the amount of acreage accorded to each, and a general discussion of methods of reclamation as related to the mechanics of earthmoving;
- (b) A comparison of the proposed post-mining land use to other land uses in the vicinity and to adopted state and local land use plans and programs. In those instances where the post-mining land use is for industrial, residential, or commercial purposes and such use is not reasonably assured, a plan for revegetation shall be submitted. Appropriate evidence supporting such reasonable assurance shall be submitted;
- (c) A description of how the Reclamation Plan will be implemented to meet each applicable requirement of Section 3.1;
- (d) Where applicable, plans for topsoil segregation, preservation, and replacement; for stabilization, compaction, and grading of spoil; and for revegetation. The revegetation plan shall contain a list of the preferred species of grass, legumes, forbs, shrubs or trees to be planted, the method and rates of seeding and planting, the estimated availability of viable seeds in sufficient quantities of the species proposed to be used, and the proposed time of seeding and planting;
- (e) A plan or schedule indicating how and when reclamation will be implemented. Such plan or schedule shall not be tied to any specific date but shall be tied to implementation or completion of different stages of the mining operation as described in Subparagraph 6.4.4(1)(e). The plan or schedule shall include:
 - (i) An estimate of the periods of time which will be required for the various stages or phases of reclamation;
 - (ii) A description of the size and location of each area to be reclaimed during each phase; and
 - (iii) An outline of the sequence in which each stage or phase of reclamation will be carried out. (The schedule need not be separate and distinct from the Reclamation Plan, but may be incorporated therein.)
- (f) A description of each of the following:
 - (i) Final grading - specify maximum anticipated slope gradient or expected ranges thereof;
 - (ii) Seeding - specify types, mixtures, quantities, and expected time(s) of seeding and planting;
 - (iii) Fertilization - if applicable, specify types, mixtures, quantities and time of application;
 - (iv) Revegetation - specify types of trees, shrubs, etc., quantities, size and location; and
 - (v) Topsoiling - specify anticipated minimum depth or range of depths for those areas where topsoil will be replaced.

17) As stated in item #8, if two different types of slope reconstruction will be utilized to achieve 3H:1V interior slopes for reclamation, you will need to clearly identify where each type will be used. Please modify the reclamation plan and reclamation plan map accordingly.

18) Please remove the statement on the top of P23 "There are no drill or auger holes on the land." There are several monitoring wells already present in the interior of the permit area.

19) Note #6 on the provided bank armoring plan states that the armoring will be covered with a 6" layer of growth medium and seeded, however the reclamation plan and text on P114 calls for 10"-12" of topsoil to be replaced prior to seeding. Please revise Note #6 for consistency as needed.

20) DRMS notes that the Minimum allowable Factor of Safety (FOS) for the proposed bank armoring is 1.25 and the calculated FOS for the armoring plan provided is 1.26. You may wish to consider revising the bank armoring plan to allow for more than a 0.01 margin of error in Factor of Safety.

EXHIBIT F - Reclamation Plan Map (Rule 6.4.6): The map(s) of the proposed affected land, by all phases of the total scope of the mining operation, shall indicate the following:

- (a) The expected physical appearance of the area of the affected land, correlated to the proposed mining and reclamation timetables. The map must show proposed topography of the area with contour lines of sufficient detail to portray the direction and rate of slope of all reclaimed lands; and
- (b) Portrayal of the proposed final land use for each portion of the affected lands.

21) The reclamation plan map will need to be modified as necessary for consistency and accuracy when addressing adequacy revisions.

EXHIBIT G - Water Information (Rule 6.4.7):

- (1) If the operation is not expected to directly affect surface or groundwater systems, a statement of that expectation shall be submitted.
- (2) If the operation is expected to directly affect surface or groundwater systems, you shall:
 - (a) Locate on the map (in Exhibit C) tributary water courses, wells, springs, stock water ponds, reservoirs, and ditches on the affected land and on adjacent lands where such structures may be affected by the proposed mining operations;
 - (b) Identify all known aquifers; and
 - (c) Submit a brief statement or plan showing how water from dewatering operations or from runoff from disturbed areas, piled material and operating surfaces will be managed to protect against pollution of either surface or groundwater (and, where applicable, control pollution in a manner that is consistent with water quality discharge permits), both during and after the operation.
- (3) You must provide an estimate of the project water requirements including flow rates and annual volumes for the development, mining and reclamation phases of the project.

(4) You must indicate the projected amount from each of the sources of water to supply the project water requirements for the mining operation and reclamation.

(5) You must affirmatively state that the Operator/Applicant has acquired (or has applied for) a National Pollutant Discharge Elimination System (NPDES) permit from the Water Quality Control Division at the Colorado Department of Health, if necessary.

22) The applicant will need to provide a site characterization and groundwater monitoring plan, including at least five quarters of baseline/background water level and groundwater analytical data, sufficient to demonstrate compliance with the requirements of the "Water Quality Control Commission Regulation No. 41 – The Basic Standards for Groundwater" for the life of the proposed operation. Please note that permanent monitoring wells and Point of Compliance (POC) wells should be placed where they will not be mined through.

23) The Mining Plan as submitted only includes a 15 foot setback from the permit boundary/utility corridor to the slurry wall on the south side of Phase 1, and does not include any provisions such as a French drain, to allow groundwater to flow unimpeded around the proposed slurry wall. No groundwater modelling data has been provided to demonstrate that the construction of this slurry wall will not result in excessive groundwater mounding on the adjacent property to the south of Phase 1, or adverse impacts to the irrigation return flows to the South Platte River which currently flow through Phase 1.

Please provide a detailed groundwater model illustrating the projected impacts to groundwater levels adjacent to the site after installation of the proposed slurry walls. This should include a groundwater contour map showing projected depths to groundwater and any mounding or shadowing on properties adjacent to the proposed permit area. If the modelling predicts excessive groundwater mounding on adjacent property, the applicant will need to provide a plan to minimize the impacts and maintain the prevailing hydrologic balance during and after mining activity.

Based on the historic data available for the site, please propose trigger levels for groundwater level mitigation and where the monitoring points will be located. For example: excessive mounding requiring mitigation could be a groundwater level increase of over 2 feet from baseline, or groundwater levels within 4 feet of the ground surface measured at the property boundary.

24) Please provide proposed locations for installation of additional groundwater monitoring wells outside of the proposed slurry wall along the south side of Phase 1 to monitor for excessive mounding on the south side of Phase 1.

25) Please remove the statement on P28 that "There are no ditches that cross the property.."

26) Please remove the reference to the Ragsdale site in the first sentence of P32.

27) Please provide trend-line water level data charts for the existing 7 wells over the period of monitoring based on either: depth to groundwater from ground surface, or groundwater elevation based on surveyed well elevation data.

EXHIBIT H - Wildlife Information (Rule 6.4.8):

(1) In developing the wildlife information, you may wish to contact the local wildlife conservation officer. You must include in this Exhibit, a description of the game and non-game resources on and in the vicinity of the application area, including:

- (a) a description of the significant wildlife resources on the affected land;
- (b) seasonal use of the area;
- (c) the presence and estimated population of threatened or endangered species from either federal or state lists; and
- (d) a description of the general effect during and after the proposed operation on the existing wildlife of the area, including but not limited to temporary and permanent loss of food and habitat, interference with migratory routes, and the general effect on the wildlife from increased human activity, including noise.

28) Please fully review and address the recommendations provided by Colorado Parks and Wildlife in their comment letter dated December 28, 2022.

EXHIBIT I - Soils Information (Rule 6.4.9): In consultation with the Soil Conservation Service or other qualified person, you must indicate on a map (in Exhibit C) or by a statement, the general type, thickness and distribution of soil over the affected land. Such description will address suitability of topsoil (or other material) for establishment and maintenance of plant growth. The above information shall satisfy "completeness" requirements for purposes of determination of date of filing.

Adequate as submitted

EXHIBIT J - Vegetation Information (Rule 6.4.10):

(1) You must include in this Exhibit a narrative of the following items:

- (a) descriptions of present vegetation types, which include quantitative estimates of cover and height for the principal species in each life-form represented (i.e., trees, tall shrubs, low shrubs, grasses, forbs);
- (b) the relationship of present vegetation types to soil types, or alternatively, the information may be presented on a map; and
- (c) estimates of average annual production for hay meadows and croplands, and carrying capacity for range lands on or in the vicinity of the affected land, if the choice of reclamation is for range or agriculture.

(2) You must show the relation of the types of vegetation to existing topography on a map in Exhibit C. In providing such information, you may want to contact the local Soil Conservation District.

Adequate as submitted.

EXHIBIT K - Climate (Rule 6.4.11): Provide a description of the significant climatological factors for the locality.

Adequate as submitted

EXHIBIT L - Reclamation Costs (Rule 6.4.12): All information necessary to calculate the costs of reclamation must be submitted and broken down into the various major phases of reclamation. You must provide sufficient information to calculate the cost of reclamation that would be incurred by the state.

29) DRMS will evaluate the reclamation bond calculation when the other adequacy issues have been resolved and the appropriate revisions made, however, the following items were noted in the initial review which you may want to address at this time.

- *Why are there 26.42 acres listed as “undisturbed” in Stage A? It may be useful to show acreage breakdowns on the reclamation plan map.*
- *Table L does not include any costs for backfilling or other reclamation of fresh water or sediment ponds.*
- *An estimate of 20,000 cy is given for backfilling approximately 6 acres of settling pond area, however, 20,000 cy would only fill a 6 acre excavation to a depth of approximately 2 feet. What is the proposed volume of the settling ponds that would need to be backfilled?*
- *No cost for demolition/hauling/disposal of any processing facilities or conveyor structures/crossings has been provided, please address.*

EXHIBIT M - Other Permits and Licenses (Rule 6.4.13): A statement identifying which of the following permits, licenses and approvals the Operator/Applicant holds or will be seeking in order to conduct the proposed mining and reclamation operations: effluent discharge permits, air quality emissions permits, radioactive source material licenses, the State Historic Preservation Office clearance, disposal of dredge and fill material (404) permits, permit to construct a dam, well permits, highway access permits, U.S. Forest Service permits, Bureau of Land Management permits, county zoning and land use permits, and city zoning and land use permits.

Will county permitting be required for future conveyor crossing(s)?

EXHIBIT N - Source of Legal Right to Enter (Rule 6.4.14): You must provide the source of your legal right to enter and initiate a mining operation on the affected land.

Adequate as submitted

EXHIBIT O - Owner(s) of Record of Affected Land (Surface Area) and Owners of Substance to be Mined (Rule 6.4.15): Please submit a complete list of all owners or show the owners on your map in Exhibit C.

Adequate as submitted

EXHIBIT P - Municipalities Within Two Miles (Rule 6.4.16): Please list any municipality(s) within two miles of the proposed mining operation and address of the general office of each municipality.

Adequate as submitted

EXHIBIT Q - Proof of Mailing of Notices to County Commissioners and Soil Conservation District (Rule 6.4.17): Please submit proof of actual delivery or proof of mailing by Certified Mail, return receipt requested, of Notice of the Application to the local Board of County Commissioners and, if the mining operation is within the boundaries of a Soil Conservation District, to the Board of Supervisors of the Soil Conservation District.

Adequate as submitted

EXHIBIT R - Proof of Filing with County Clerk and Recorder (Rule 6.4.18): You must submit an affidavit or receipt indicating the date on which the application was placed with the local County Clerk and Recorder.

Adequate as submitted

EXHIBIT S - Permanent Man-Made Structures (Rule 6.4.19): Please note that roadways and above-ground or underground utilities (if present) within 200 feet of the proposed affected area are considered permanent man-made structures. In accordance with Rule 6.4.19, when mining operations will adversely affect the stability of any significant, valuable and permanent man-made structure located within 200 feet of the affected area, the applicant may either:

(a) Provide a notarized agreement between the applicant and the person(s) having an interest in the structure, that the applicant is to provide compensation for any damage to the structure;

or

(b) Where such an agreement cannot be reached, the applicant shall provide an appropriate engineering evaluation that demonstrates that such structure shall not be damaged by activities occurring at the mining operation.

30) Please make sure that any adjustments made to the setbacks, armoring, and interior pit sloping methods made to the proposed mining and reclamation plans through the adequacy process are accurately reflected in the slope stability analysis provided, and/or provide a discussion as to why the submitted analysis is still valid.

Additional Information: You will also need to provide the Division with proof of notice publication as well as proof of notice to surrounding property owners within 200' of the permit. Any letters from other commenting agencies/entities received by the Division to-date are available for you to review on the Division's website at <https://drms.colorado.gov/> utilizing the DRMS WebLink (Laserfiche) link on the home page.

This concludes the Division's preliminary adequacy review of this application. This letter shall not be construed to mean that there are no other technical deficiencies in your application. Other issues may arise as additional information is supplied. Please remember that the decision date for this amendment application is February 28, 2023. As previously mentioned, if you are unable to provide satisfactory responses to any inadequacies prior to

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February 6, 2023
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this date, it will be your responsibility to request an extension of time to allow for continued review of this application. If there are still unresolved issues when the decision date arrives and no extension has been requested, the application will be denied. If you have any questions, please contact me at (303) 229-9414.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eric Scott". The signature is stylized with a large, looped "E" and a cursive "Scott".

Eric Scott – Environmental Protection Specialist