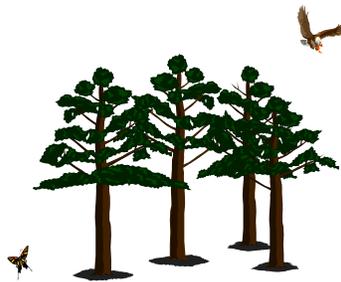




FEDERAL AVIATION ADMINISTRATION

EASTERN REGION
AIRPORTS DIVISION

**Short Environmental
Assessment Form
for
AIRPORT DEVELOPMENT
PROJECTS**



Airport Name: Francis S. Gabreski Airport

Identifier: FOK

Proposed Project: SunEdison Francis S. Gabreski Solar Installation Project

This Environmental Assessment becomes a Federal document when evaluated, signed, and dated by the Responsible FAA official.

Responsible FAA Official

Date

Complete the following information:

Project Location

Airport Name: Francis S. Gabreski Airport Identifier: FOK
Airport Address: 150 Riverhead Road
City: Westhampton Beach County: Suffolk State: New York Zip: 11978

Airport Sponsor Information

Point of Contact: Mr. Anthony Ceglie, Airport Manager
Address: 150 Riverhead Road
City: Westhampton Beach State: New York Zip: 11978
Telephone: 631.852.8095 Fax: 631.852.8092
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1. Introduction/Background:

SunEdison has been selected by Suffolk County for the development, design, construction, operation and maintenance of a Solar PV Development project (the Project) at the Francis S. Gabreski Airport in the Village of Westhampton Beach, Town of Southampton, Suffolk County, New York. The Francis S. Gabreski Airport, which is owned by Suffolk County, is a general aviation airport located on 1,451 acres on eastern Long Island (Figure 1).

SunEdison is proposing to install up to 3.1 megawatts (MW) of new ground mounted photovoltaic solar modules. The Project will require approximately 25.8 acres of land that will be leased from the Suffolk County Department of Economic Development and Planning. The proposed solar installation project will be located at two separate areas adjacent to existing airport runways at the Airport.

The Project is proposed to be located in two separate areas adjacent to existing airport runways. The proposed sites consist of approximately 25.8 acres of meadow, cleared land and scrub woods with approximately 18.1 acres located to the north of the runways and approximately 7.7 acres to the south of the runways. However, only approximately 0.3 acres of new impervious surfaces will be created. Figure 1 shows the Project location and photographs of the existing sites. The sites proposed for development are currently undeveloped and contain no structures or other airport facilities.

Suffolk County will incur no up-front capital costs, and will receive financial compensation in the form of annual lease payments. In supporting the installation of PV solar generation on county property, the Suffolk

County Department of Economic Development and Planning expects to provide the county with both economic and environmental benefits. The lease payments generated by the construction and operation of the facility will go directly to the airport's improvement/management fund. The system will be connected to the PSEG's grid under PSEG's Clean Solar Initiative Feed-in Tariff II (FIT II) program.

SunEdison proposes to commence on-site construction during the 1st quarter of 2016. Construction of the installations are anticipated to be completed in the 2nd quarter of 2016, with the facility operational and on-line before the end of that year.

2. Project Description (List and clearly describe ALL components of project proposal including all connected actions). **Attach a map or drawing of the area with the location(s) of the proposed action(s) identified:**

Design and Operation

Construction and operation of the Project includes the lease of land at the Gabreski Airport. The leasing of the land constitutes a federal action and triggers the National Environmental Policy Act (NEPA), as the airport is a public use facility overseen by the FAA. The Project will consist of sets (arrays) of ground mounted solar panels that are set at tilt angles and proper azimuths to receive solar energy. The two array fields will be directly interconnected to and provide energy into PSEG's local electric distribution grid. Figures 2 and 3 depict the location of the array and the site plan, respectively. All crossings of airport taxiways will be completed through the use of jack and bore techniques and no trenching across taxiways is proposed.

The north arrays consist of two areas of photovoltaic panels north of runways 15/33 and 6/24. The north arrays are set back 550 feet back from runway centerlines and 220 feet from taxiway centerlines and clear of all runway and taxiway safety and object-free areas. Two inverters are located immediately adjacent to the footprint of the north arrays. The north interconnect, 9ALL798, is located approximately 700 feet off of Airport property near the intersection of Old Main Road and CR 31. A buried electric conduit will connect the inverter to the interconnect: the proposed path runs west and north from the inverter approximately 900 feet, crosses Taxiway N, and proceeds generally north 2,000 feet and crosses North Perimeter Road, exits the airport property and then north approximately 2,000 feet to the interconnect. The depth of the conduit trench is approximately 2 feet and the width depends on the equipment used, not to exceed 1.5 feet.

The south arrays consist of two areas of photovoltaic panels south of runways 15/33 and 6/24. The south arrays are set back 850 feet and 325 feet back from runway and taxiway centerlines, respectively, and clear of all runway and taxiway safety and object-free areas. One inverter is located immediately adjacent to the footprint of the south array. The south interconnect, 9D943, is located approximately 300 feet southeast of Airport property on South Perimeter Road. A buried electric conduit will connect the inverter to the interconnect: the proposed path runs generally southwest from the inverter approximately 650 feet, crosses Taxiway S, and proceeds generally south, east, southeast, and east crossing South Perimeter Road and the railroad right-of-way, approximately 5,100 feet to the interconnect. The depth of the conduit trench is approximately 2 feet and the width depends on the equipment used, not to exceed 1.5 feet.

All setbacks proposed for the solar facility have been reviewed and approved by the Airport Manager. The Airport Manager and his staff have reviewed and approved the solar layout and the revision to the Airport Layout Plan (ALP).

Each DC/AC inverter would consist of electrical equipment fully contained in a metal cabinet. The inverters would be located on a poured in place concrete slab approximately 10' x 15'. The inverters would be located near each array and be constructed during the same period of time the photovoltaic panels are constructed.

The proposed site arrangement has been designed to minimize disturbance to existing green spaces to the extent possible. Unless otherwise indicated by Airport Management, landscaping will include restoring the site to pre-construction conditions, with the exception of installing trees or other landscaping items that would cast shade onto the modules. Through discussion with Airport management the proposed Project will utilize the existing airport perimeter fence for site security. No additional fencing is proposed as the existing airport perimeter fencing will satisfy site security and safety requirements.

In the O&M phase, system performance will be monitored using the SunEdison's Energy & Environmental Data System. Qualified technicians will monitor the system's performance 24 hours per day, seven days per week from the Renewable Operations Center located at SunEdison's headquarters. Through the use of the SunEdison Energy and Environmental Data System (SEEDS), SunEdison is able to remotely perform state-of-the-art O&M services including: remote shutdown of systems' main breakers; grid analysis; trip analysis; reduction and increase of inverter power on-demand based on utility requests (remote curtailment); power factor adjustment; voltage control; Remote Supervisory Control and Data Acquisition operation and control; and dynamic inverter adjustments using closed loop control. In addition, SunEdison will perform regular cleaning and maintenance on-site, typically twice per year utilizing manual and mechanical means. All equipment will be fueled off-site.

Construction

The initial stage of on-site work will include survey and mark-out of existing buried utilities, and foundation and trenching excavation. Preconstruction off-site work will consist of the fabrication of assembly of the strings of solar arrays. Once completed, the string assemblies will be loaded onto a flatbed truck and delivered to the airport sites.

On-site construction activities will include:

- Erection of fencing around each site;
- Clearing and grubbing of onsite vegetation;
- Installation of pilings or pouring of foundations;
- Installation of DC/AC inverters; and
- DC electrical interconnections to inverters.

Simultaneous to the installation of the arrays, PSEG will install the AC interconnections to its local overhead or buried electric distribution system.

Up to 25 craft workers will be on-site during construction; one full time oversight staff person will be assigned to communicate with the air traffic control tower any time construction equipment and/or personnel cross taxiways. Construction equipment will not be permitted to cross runways.

Airport Assessment Committee

In addition to the permits and approvals required for the Project (listed in Section 7, Table 3 of this document), a solar glare analysis was conducted to determine the presence or absence of solar glare and glint potentially generated from the Project in compliance with the FAA's *Interim Policy on Solar Energy Projects at Federally Obligated Airports*. TRC utilized the newly released and FAA endorsed *Solar Glare Hazard Analysis Tool* (SGHAT) to predict when and where glare may occur from a prescribed PV array and will deploy modules on the airport sites that have been designed to lower solar reflectance and therefore produce a reduced occurrence of glare. The results from the Solar Glare Study are submitted to the FAA under separate cover for review and comment.

Please see Figure 1 for the location map and images of the project area.

3. Project Purpose and Need:

Suffolk County released its Request for Proposals (RFP) for Development, Design, Construction, Operation and Maintenance of a Solar PV Development on Suffolk County Property (RFP no. 13032) in October 2013 to facilitate the cost-effective, utility-scale development of solar PV generating systems on county property. In hosting a PV solar project at the county-owned Gabreski Airport, Suffolk County aims to meet the following goals:

- Be part of America’s achievement of reducing greenhouse gases by offsetting the need to build conventional power plants;
- Help the state of New York reach its Regional Portfolio Standards (RPS);
- Improve air quality in Suffolk County, which has received an “F” from the American Lung Association;
- Serve as a demonstration project for other solar projects in the northeast;
- Create construction jobs in the short-term and spur renewable energy industry in Suffolk County; and
- Find new revenue sources for the county, which includes lease payments from solar projects on county-owned properties will provide.

This Project is also part of the overall initiative by PSEG to support and meet the State’s RPS, a policy that seeks to increase the proportion of renewable electricity used by customers. The State’s RPS goal is to annually have 25 percent of the power consumed in-State to be generated by renewable energy resources by 2013. Moreover, PSEG is currently evaluating its own renewable energy resources goal as being 30 percent by 2015 as addressed in its *2009 – 2018 Electric Resources Plan*. This Project will support that effort as well.

The Project will achieve the following PSEG objectives:

- Build upon PSEG’s Clean Energy Initiative and Solar Pioneer programs;
- Diversify PSEG’s on-Island energy resources;
- Increase reliability and security of the PSEG generation and distribution system by using a renewable energy source on distributed sites throughout PSEG’s service territory;
- Reduce PSEG’s dependencies on fossil fuels and its current on-Island fossil fueled electric generation resources; and
- Increase PSEG’s renewable energy portfolio and reduce its carbon footprint.

4. Describe the affected environment (existing conditions) and land use in the vicinity of project:

Land Use

The proposed Project site is entirely within the Gabreski Airport property. The current land use classification, for all of the Gabreski Airport, and thus the Project site, is Transportation. The draft update of the Airport Master Plan was prepared in 2012 (Savik & Murray – DY Consultants, 2012) shows the area surrounding the project sites as ‘tree-areas’ (see Figure 4).

To the north and west of the airport, most of the land is designated as recreation and open space with small areas of residential, institutional and industrial uses interspersed. Recreational and open space also abuts the airport to the east. South of the airport the land use is a mixture of residential (low and medium density), commercial, industrial, recreational and open space, and utility uses, with no single dominant land use. Figure 4 shows existing land use in Suffolk County.

Vegetation and Topography

The proposed Project is to be constructed on land that is previously disturbed by airport operations and of limited value for other applications due to its proximity to the airport runways. The proposed location of the northern solar arrays is within a historically cleared area with rolling topography and predominantly scrub-shrub vegetation. The proposed location of the southern solar arrays is within a flat, previously cleared area primarily comprised of herbaceous and scrub-shrub vegetation and pitch pine and scrub oak saplings. The site proposed for solar development is periodically mowed and managed to prevent vegetation from getting too high and interfering with runway sight lines.

Zoning

The property on which the Project is to be constructed is owned by the County of Suffolk and as such, are under the jurisdictional control of the County. As such it is not subject to local zoning.

Community Facilities

Gabreski Airport is located in the Town of Southampton, which contains over 50,000 people (US Census, 2010). In addition to the airport, Southampton and the County offer a full complement of public facilities and resources to meet the needs of the area’s population. It also contains beaches and facilities that attract visitors from outside the County. In addition to regular police activities, the Southampton Police Department includes a Community Response Unit that provides police services for special events and special traffic enforcement (Southampton, 2014). The Suffolk County Sheriff’s Department maintains an office on airport grounds. Local medical facilities include Southampton Hospital, several medical clinics as well as private medical practices. The northwest corner of the airport property is located in the Village of Westhampton, which is part of Southampton and provides emergency services through a volunteer fire department to the local area.

Cultural Resources

The Project sites do not contain any resources listed in the State or National Registers of Historic Places, nor are they adjacent or substantially contiguous to any such resource. Based on review of <http://nysparks.com/shpo/online-tools> the sites are not situated within an archaeologically sensitive area as identified by the New York Office of Parks, Recreation and Historic Preservation (OPRHP).

Visual Resources

The site of the proposed solar installation is on Gabreski Airport property and immediately adjacent to existing runways and taxiways. Gabreski Airport is an existing general aviation airport with both private use and Air National Guard facilities: airport operations occur throughout the year. The land within the airport property is established for both transportation and commercial use and, in addition to three runways, contains

roads and buildings that support the airport operations. Land immediately surrounding the airport includes open space to the west, north, and east, and developed residential properties to the south.

5. Alternatives to the Project: Describe any other reasonable actions that may feasibly substitute for the proposed project, and include a description of the “No Action” alternative. If there are no feasible or reasonable alternatives to the proposed project, explain why (attach alternatives drawings as applicable):

Alternatives

The Proposed Action is the Preferred Alternative and consists of constructing a new ground-mounted photovoltaic solar array that could potentially generate up to 3.1 MW of renewable energy. The array would be located on approximately 25.8 acres of leased airport land and adjacent to two runways. Figure 4 depicts the location of the arrays in context to Airport runways and taxiways as well as and affiliated support infrastructure for the Project. (Figure 5)

Other Alternatives were considered and rejected. This includes other on-site ground-mounted PV arrays in locations near the airfield. Three Alternatives were considered for the proposed Project; each alternative was a ground-mounted PV array in the general vicinity of the Preferred Alternative with a different footprint. However, each rejected alternative generated solar glare that was visible from the air traffic control tower or moderate glare to an approach to a runway

No Action Alternative

The No Action Alternative would involve no construction at the airport, including no construction of electric distribution lines to connect to the PSEG grid. Under the No Action Alternative, the County-owned airport site would be expected to remain in its current condition with annual and perennial grasses, open shrub/scrub, and lightly woodland. Under No Action Alternative, none of the benefits of the project would accrue to the area. Suffolk County would not receive the annual lease payments from the Project or achieve its objective of diversifying its energy resources with renewable resources. Similarly, PSEG would not be able to use the electricity generated by the Project to help meet its own or the State’s RPS.

Explanation

Because the No Action Alternative does not achieve the overall environmental and economic benefits of the Proposed Action, it is not the preferred course of action.

6. Environmental Consequences – Special Impact Categories (refer to the Instructions page and corresponding sections in Appendix A of 1050.1E and the Airports Desk Reference for more information and direction. The analysis under each section must comply with the requirements and significance thresholds as described in the Desk Reference).

(A) AIR QUALITY (Please note this analysis must meet requirements for both NEPA review and Clean Air Act (CAA) requirements).

Clean Air Act

(a) Is the proposed project located in a nonattainment or maintenance area for the National Ambient Air Quality Standards (NAAQS) established under the Clean Air Act and does it result in direct emissions (including construction emissions)?(If **Yes**, go to (b), **No**, go to the NEPA section below.

Yes. Suffolk County is presently a nonattainment area for PM_{2.5} and marginal for 8-hour ozone.

(b) Is the proposed project an “exempted action,” under the General Conformity Rule or Presumed to Conform (See FRN, vol.72 no. 145, pg 41565)? (If **Yes**, cite exemption and go to NEPA section below; **No**, go to (c)).

No. The proposed project is not an “exempted action,” under the General Conformity Rule or Presumed to Conform (FRN, vol.72 no. 145, pg. 41565).

(c) Would the proposed project result in a net total of direct and indirect emissions that exceed the threshold levels of the regulated air pollutants for which the project area is in non-attainment or maintenance? (Attach emissions inventory). (If **Yes**, consult with ADO).

No. The proposed project would not result in a net total of direct and indirect emissions that exceed the threshold levels of the regulated air pollutants for which the project area is in non-attainment or maintenance.

NEPA

(a) Is the airport’s activity levels below the FAA thresholds for requiring a NAAQS analysis? (If **Yes**, document activity levels and go to Item 2, **No**, go to (b)).

Yes. The airport’s activity levels -- 62,000 landings and take offs -- are below the FAA thresholds for requiring a NAAQS analysis.

(b) Do pollutant concentrations exceed NAAQS thresholds? (Attach emissions inventory).

No. Pollutant concentrations do not exceed NAAQS thresholds. The estimated construction emissions for the SunEdison Francis S. Gabreski Solar Installation Project are detailed below. The emissions estimates for vehicle exhaust are based on AP-42 Volume 2, Appendix H. Road traffic emissions (emissions of particulate matter from vehicle traffic) are based on Equation (1a) from AP-42, Section 13.2.2-4. Fugitive dust emissions from general construction activities, such as grading, moving soil, digging, etc. are based on Equation A6-3 from The Aviation Emissions and Air Quality Handbook, Version 3. Total project emissions of oxides of nitrogen (NO_x), carbon monoxide (CO) and volatile organic compounds (VOC) are all estimated to be below one (1) ton of each pollutant. Total particulate matter smaller than ten (10) microns (PM₁₀) emissions are estimated to be approximately 71 tons while particulate matter smaller than 2.5 microns (PM_{2.5}) emissions are approximately 7 tons. Table 1 summarizes the short term hourly emissions as well as the total project emissions.

Table 1										
Summary of Air Quality Emissions Inventory.										
Source Description	NO _x		CO		VOC		PM ₁₀		PM _{2.5}	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
Vehicle Operation	0.44	0.19	1.05	0.66	0.14	0.06	66.30	47.62	6.63	4.76
Construction Activities	-	-	-	-	-	-	12.9	23.22	1.29	2.32
Total	0.44	0.19	1.05	0.66	0.14	0.06	79.20	70.84	7.92	7.08

(c) Is an air quality analysis needed with regard to state indirect source review?

No. An air quality analysis is not needed with regard to state indirect source review.

(B) BIOTIC RESOURCES

Describe the potential of the proposed project to directly or indirectly impact plant communities and/or the displacement of wildlife. (This answer should also reference Section 19, Water Quality, if jurisdictional water bodies are present).

The proposed location of the northern solar arrays is within a historically-cleared area with rolling topography and Dwarf Pine Plains and Pitch-Pine-Oak-Heath Woodland natural communities. Due to Airport regulations that require the removal of trees that obstruct the view of the airport tower, a number of pitch pine were felled by the airport and remain on site. No wetlands or streams are present within or in the vicinity of the proposed northern solar arrays (see Figure 7). The clearing of approximately 0.40 acres of vegetation and trees would occur for the placement of the arrays as well as to reduce shading of the panels by nearby trees. The area of the northern solar arrays was historically cleared during the development of airport facilities, and trees are selectively cut when they reach heights that interfere with views from the air traffic control tower. Therefore, trees in this area do not exceed a height of approximately 15 feet. No potential long-term impacts to vegetation are anticipated because the existing vegetation has been regularly managed.

The proposed location of the southern solar arrays is within a flat, previously cleared area primarily comprised of Pitch-Pine-Oak-Heath- Woodland and Pitch Pine-Oak Forest. The cleared area was treated approximately six years ago and undergoes maintenance clearing once per year to ensure the airport tower has clear site lines of the runway. No wetlands or streams are present within or in the vicinity of the southern solar arrays proposed location (see Figure 7). The clearing of approximately 0.75 acres of vegetation and trees would occur for the placement of the arrays as well as to reduce shading of the panels by nearby trees. The Gabreski Airport Proposed Land Use Plan (2012) has slated the areas if the proposed solar array as “future clearing” as it is important for the air traffic control towers to maintain clear sight lines of the runways. No potential long-term impacts to vegetation are anticipated because the existing vegetation has been regularly managed.

The proposed solar array sites are situated within or adjacent to CEAs designated by Suffolk County and the Town of Southampton including the Central Pine Barrens as designated by New York State under the Long Island Pine Barrens Protection Act (NY ECL Title I of Article 57) (<http://www.pb.state.ny.us>). As shown on Figure 8, the proposed solar sites are located in the CGA and the Dwarf Pine Forest CEA is located approximately 0.5-mile west of the proposed solar arrays.

Consultation with the NYNHP was conducted to determine recorded occurrences of Federal- and State-listed RTE species and natural communities within or in the vicinity of the proposed solar array locations. TRC completed the USFWS New York Field Office on-line project review to determine Federally-listed RTE species with potential to occur within the Gabreski Airport property. Table 2 summarizes the results of the on-line project review. No designated Critical Habitat is located within or in the vicinity of the proposed sites and therefore no direct impact is anticipated.

Table 2. Federally-listed RTE Species in Suffolk County						
Common Name	Taxonomic Name	Federal Status	Potential Habitat Present	Species Present ¹	Habitat Characteristics	Potential for Take
Plants						
Sandplain gerardia	<i>Agalinis acuta</i>	Endangered	No	No	Traditionally a maritime grassland species maintained by fire and grazing; now prefers grasslands in the Pine Barrens with broad, grassy swaths; and other remnant grasslands of the South Fork including around golf courses, and along roadsides and railroads. Needs some disturbance which provides bare soil areas.	Take is not anticipated
Seabeach amaranth	<i>Amaranthus pumilus</i>	Threatened	No	No	Barrier island beaches between the foredune and wrack line, and also open overwash areas behind the foredune.	Take is not anticipated
Animals						
Piping plover	<i>Charadrius melodus</i>	Threatened	No	No	Dry, sandy beaches or areas filled with dredged sand, often near dunes with little or no beach grass.	Take is not anticipated
Roseate tern	<i>Sterna dougallii dougallii</i>	Endangered	No	No	Marine coastal species; salt marsh islands and beaches with sparse vegetation.	Take is not anticipated
Red knot	<i>Calidris canutus rufa</i>	Proposed Threatened	No	No	Coastal marine and estuarine habitats with large areas of intertidal sediments; sandy, gravel, cobble beaches, tidal mudflats, salt marshes, shallow coastal impoundments, lagoons, and peat banks.	Take is not anticipated
¹ Species present determined by consultation with the NYNHP, provided in Appendix B. Source: USFWS. 2014. Species By County Report: Suffolk, NY. Accessed online May 14, 2014 at: http://www.fws.gov/northeast/nyfo/es/section7.htm						

(C) COASTAL RESOURCES

(a) Would the proposed project occur in a coastal zone, or affect the use of a coastal resource, as defined by your state's Coastal Zone Management Plan (CZMP)? Explain.

No. The proposed Project is not located in New York's Coastal Zone Management Plan.

(b) If **Yes**, is the project consistent with the State's CZMP? (If applicable, attach the sponsor's consistency certification and the state's concurrence of that certification).

Not applicable.

(c) Is the location of the proposed project within the Coastal Barrier Resources System? (If **Yes**, and the project would receive federal funding, coordinate with the FWS and attach record of consultation).

No. The location of the proposed project is not within the Coastal Barrier Resources System.

(D) COMPATIBLE LAND USE

(a) Would the proposed project result in other (besides noise) impacts that have land use ramifications, such as disruption of communities, relocation of residences or businesses, or impact natural resource areas? Explain.

No. There will be no adverse land use or zoning impacts from construction and operation of the solar installation. As shown on Figure 1, the Project site is located entirely on airport property between runways and on land that is currently undeveloped open space. Use of the proposed sites for solar power production will make productive use of land that, given its proximity to active runways, has extremely limited options for some other productive use. The solar installations will not require any new permanent off-site facilities nor will they have any impact on land use adjacent to the airport. During both construction and operation, airport operations will continue normally.

(b) Would the proposed project be located near or create a wildlife hazard as defined in FAA Advisory Circular 150/5200-33, "Wildlife Hazards On and Near Airports"? Explain.

The proposed project would not be located near nor create a wildlife hazard because the project consists of ground-mounted stationary structures that would not be attractive to wildlife.

(E) CONSTRUCTION IMPACTS

Would construction of the proposed project increase ambient noise levels due to equipment operation; degrade local air quality due to dust, equipment exhausts and burning debris; deteriorate water quality when erosion and pollutant runoff occur; and/or disrupt off-site and local traffic patterns? Explain.

Construction

The Project's construction plan and schedule will be coordinated with Suffolk County and the Airport and will include the following construction-related traffic procedures:

- The solar equipment will be transported to the airport and assembled on-site. Construction equipment that is required at each array site will remain on the site only as long as necessary for the scheduled activity and will then be moved off-site in the overnight or off-peak traffic hours.
- Construction materials, will also arrive on-site overnight and/or during off-peak hours, and will be staged on-site for daytime unloading and installations. Empty delivery vehicles will depart the airport during off-peak hours or overnight. One known exception to this procedure will be the pre-mixed concrete for the array foundations. Concrete to be delivered from local batch pre-mix plants in standard over-the-road pre-mix concrete trucks will be scheduled to arrive in the off-peak weekday hours. Concrete trucks will travel along designated truck routes identified by Suffolk County.
- The number of truck trips to each Project site will be minimal on a daily basis. If two concrete trucks arrive on the same day as well as trucks with electrical equipment, solar modules, and a dumpster, the total number of trips will be 10.

The number of trucks associated with delivery of equipment and materials to the airport sites is limited and estimated as follows:

- Eight concrete trucks;
- One semi-trailer truck with electrical equipment;
- One semi-trailer truck with preassembled solar modules; and
- One dumpster (or less).

The craft labor required for construction, which will number about 10 – 25 workers, will travel to and from the airport via small truck and or automobile, accessing the airport from Old Riverhead Road. It is assumed that 75 percent will drive as individuals; 25 percent will carpool with other site workers. Therefore, the number of round trips associated with craft labor will be approximately 15 to 38 per day, excluding any miscellaneous mid-day travel.

In total, the number of vehicle trips (trucks and craft labor) is expected to be an estimated 25 to 48 trips per day during construction. Given the proposed night-time and off-peak equipment and materials delivery schedule as well as the limited number of weekday and labor trips, there will be no significant adverse traffic impacts associated with Project construction. Construction staging and parking for construction workers will be accommodated on airport property without displacing airport staff and users.

The Proposed Action will not require any changes to the road network outside of the airport; nor any permanent alterations to the interior airport road network. There will be no permanent loss of parking spaces. All interior changes to site driveways and parking areas, if necessary, will be temporary, about five to eight months on average is needed to construct the arrays at each site.

Following construction, there will be only a limited number of vehicle trips associated with the Proposed Action. About twice annually, the panels will be inspected during the spring and fall, and the panels will be cleaned, if needed. The panels may also be cleared of accumulated snow and ice on an as-needed basis during winter months through one of the following methods, based on economics: 1) a hand-held “squeegee,” 2) bobcat-Driven snow blower; 3) let snow/ice remain on the panels. For these maintenance operations, there will be no more than two vehicles and four workers on each site for a maximum of a few days. There may also be other miscellaneous periodic trips to inspect the solar arrays.

To summarize, only a very limited number of vehicle trips will be generated from construction or operation of the Proposed Action, and no significant adverse traffic impacts are anticipated. No mitigation is required.

Noise

During construction, noise will be generated by construction equipment and vehicles, but no significant adverse noise impacts are anticipated from the operation of the solar arrays. In any case, construction noise will not exceed noise from aircraft operations. In 2012, the airport averaged 162 aircraft operations per day (AirNav.com, 2014).

Once installed, there will be no noise generated by the operations of the solar panels which convert sunlight to electricity using photovoltaics, as there are no exterior mechanical or moving components. ‘Crystalline’ PV modules will be used at all of the solar panel installations.

As noted previously, there may be periodic cleaning of the solar panels (up to twice annually, depending on the inspected surface conditions of the panels), and as-required seasonal snow and ice removal. Little noise, if any, will be discernable on and off-site from these temporary maintenance activities.

Mitigation is not required as there will be no significant adverse noise impacts.

(F) SECTION 4(f) RESOURCES

Does the proposed project have an impact on any publicly owned land from a public park, recreation area, or wildlife or waterfowl refuge of national, state, or local significance, or an historic site of national, state, or local significance? (If **Yes**, contact FAA, contact appropriate agency and attach record of consultation).

No. The Proposed Action would only occur on undeveloped land within the existing Airport. The Proposed Action does not have an impact on any publicly owned land from a public park, recreation area, or wildlife or waterfowl refuge of national, state, or local significance, or an historic site of national, state, or local significance. Further, no historic sites exist within the project area. Therefore, the Proposed Action would not result in significant adverse impacts to Section 4(f) resources.

(G) ENDANGERED AND THREATENED SPECIES

(a) Would the proposed project impact any federally or state-listed or proposed, endangered, or threatened species (ESA) of flora and fauna, or impact critical habitat? (Attach record of consultation with federal and state agencies as appropriate).

No. The proposed Project would not impact any federally or state-listed or proposed, endangered, or threatened species of flora and fauna, or impact critical habitat. SunEdison completed the USFWS New York Field Office on-line project review to determine federally-listed RTE species with potential to occur within the Airport property. Tables 3 and 4 summarize the results of the on-line project review. No designated Critical Habitat is located within or in the vicinity of the proposed sites.

Table 3. Federally-listed Rare, Threatened, and Endangered Species in Suffolk County, New York		
Common Name	Taxonomic Name	Federal Status
Plants		
Sandplain gerardia	<i>Agalinis acuta</i>	Endangered
Seabeach amaranth	<i>Amaranthus pumilus</i>	Threatened
Animals		
Piping plover	<i>Charadrius melodus</i>	Threatened
Roseate tern	<i>Sterna dougallii dougallii</i>	Endangered
Red knot	<i>Calidris canutus rufa</i>	Proposed Threatened
Source: USFWS. 2014. Species By County Report: Suffolk, NY. Accessed online May 14, 2014 at: http://ecos.fws.gov/tess_public/countySearch!speciesByCountyReport.action?fips=36103		

Table 4. State-listed RTE Species within 1-mile of the Gabreski Airport		
Common Name	Taxonomic Name	State Status
Plants		
Showy aster	<i>Eurybia spectabilis</i>	Threatened
Animals		
Upland sandpiper	<i>Bartramia longicauda</i>	Threatened
Northern harrier	<i>Circus cyaneus</i>	Threatened
Coastal barrens buckmoth	<i>Hemileuca maia</i>	Special Concern
Source: NYNHP. 2014. Nature Explorer. Accessed online May 15, 2014 at: http://www.dec.ny.gov/natureexplorer/app/		

None of the federal-listed species summarized in Tables 3 and 4 or their critical habitat were observed within the proposed solar array sites during natural resource surveys on May 5, 2014; however, species specific surveys were not conducted. Attachment 1 contains the letters of correspondence regarding federal-listed species consultation.

The Project would involve the permanent removal of a stand of pitch pine (*Pinus rigida*) with an understory of oak species (*Quercus ilicifolia* and *Quercus prinoides*), red maple (*Acer rubrum*), and blueberry species (*Vaccinium sp.*). Trees and shrubs would be prevented from growing in the area of the photovoltaic array to prevent shading of the panels. However, a grassy groundcover layer would be allowed to grow under the panels and support structures. During the construction period, wildlife would be impacted in the short term due to construction activity. Songbirds would access the ground layer inside the fenced area.

(b) Would the proposed project affect species protected under the Migratory Bird Act? (If **Yes**, contact FAA).

Yes. Two species of threatened birds are present on Airport property: the upland sandpiper (*Bartramia longicauda*) and the grasshopper sparrow (*Ammodrammus savannarum*). Both species nest and feed on the ground and would be temporarily impacted during the construction period when the annual and perennial grasses are removed. The northern harrier (*Circus cyaneus*) hunts for prey on the Airport property and would be temporarily affected in the short term during the construction period. The Project would not remove habitat from either species. The presence of the solar arrays would remove approximately 20 acres of hunting habitat from the species.

(H) ENERGY SUPPLIES, NATURAL RESOURCES AND SUSTAINABLE DESIGN

What effect would the proposed project have on energy or other natural resource consumption? (Attach record of consultations with local public utilities or suppliers if appropriate)

The public will benefit from the production of electrical energy without the use of fossil fuels and the emitting of air pollutants. The Proposed Action will not impact existing energy supplies of natural resources. The Project will contribute up to 3.1 MW to the local power grid.

(I) ENVIRONMENTAL JUSTICE

Would the proposed project have a disproportionate impact on minority and/or low-income communities? Consider human health, social, economic, and environmental issues in your evaluation. Explain.

No. As shown on Figure 9, the only potential Environmental Justice area identified by the NYSDEC GIS tool is outside of the 0.5 mile buffer surrounding the airport. The environmental justice community is located more than 0.5 miles west of the airport boundary. Although the Town of Southampton and the Villages of Westhampton Beach and Quogue contain higher percentages of individuals below poverty than the County as a whole, and Southampton and Westhampton Beach contain higher percentages of minority populations than the County as a whole, those municipalities do not contain concentrations of populations within the 0.5 mile buffer zone around the airport that qualify as Environmental Justice populations. In addition, the solar facilities at the airport will not produce any airborne emissions or create noise or traffic during operation that could be hazardous to the health or wellbeing of minority or low income populations if they did occur in Environmental Justice proportions in the area. In summary, the Proposed Action will not create a disproportionate share of negative environmental consequences on minority and low income populations.

(J) FARMLANDS

Does the project involve acquisition of farmland, or use of farmland, that would be converted to non-agricultural use and is protected by the Federal Farmland Protection Policy Act (FPPA)? (If **Yes**, attach record of coordination with the Natural Resources Conservation Service (NRCS), including form AD-1006.)

No. The Project will not involve the acquisition of farmland or use farmland that would be converted to non-agricultural use.

(K) FLOODPLAINS

(a) Would the proposed project be located in, or would it encroach upon, any 100-year floodplains, as designated by the Federal Emergency Management Agency (FEMA)?

No. The upper reaches of Aspatuck Creek and Quantuck Creek originate near the southern boundary of the airport property and extend south. Neither creek is considered a Wild and Scenic River by the U.S. Department of the Interior (Public Law 90-542; 16 U.S.C. 1271 et. seq.) (NPS, 2014), or a Wild, Scenic, or Recreational River under the New York State WSRR System (6 NYCRR Part 666) (NYSDEC, 2014). The NYSDEC-regulated wetlands and 100-year floodplains associated with Aspatuck Creek and Quantuck Creek are located adjacent to, but outside of, the Francis S. Gabreski Airport to the south and east (see Figure 5).

(b) If Yes, attach the corresponding FEMA Flood Insurance Rate Map (FIRM) and describe the measures to be taken to comply with Executive Order 11988.

Not applicable.

(L) HAZARDOUS MATERIALS

Would the proposed project involve the use of land that may contain hazardous materials or cause potential contamination from hazardous materials? (If **Yes**, attach record of consultation with appropriate agencies). Explain.

No. Based on the review of the Project area, hazardous materials are not expected to be encountered during construction. All Project contractors will be required to comply with applicable state and federal regulations with respect to hazardous materials and any materials required on-site during construction will be handled and/or disposed of according to applicable laws. However, if any contaminated soils are discovered, the SunEdison contractor will be required to follow all applicable federal and state hazardous materials requirements for investigative and remedial work on the site, and the disposal of any such materials.

(M) HISTORIC, ARCHITECTURAL, ARCHEOLOGICAL OR CULTURAL PROPERTY

(a) Describe any impact the proposed project might have on any properties in or eligible for inclusion in the National Register of Historic Places. (Include a record of your consultation and response with the State or Tribal Historic Preservation Officer (S/THPO)).

The Proposed Action will cause no direct or indirect impacts to historic properties. There are no known cultural resources within the Airport property and none listed on the State or National Register of Historic Places within 0.5 mile of the proposed photovoltaic sites. Given the low profile of the solar arrays and the existing industrial character of the airport, even if unknown historic properties were present outside the airport boundary, the addition of the solar arrays would not significantly affect the visual context of the area resources. The record of conversation with the agencies is in Attachment 1.

(b) Describe any impacts to archeological resources as a result of the proposed project. (Include a record of consultation with persons or organizations with relevant expertise, including the S/THPO, if applicable).

The Project will cause no direct or indirect impacts to archaeological properties.

(N) INDUCED SOCIOECONOMIC IMPACTS

Would the proposed project cause induced, or secondary, socioeconomic impacts to surrounding communities, such as change business and economic activity in a community; impact public service demands; induce shifts in population movement and growth, etc.? Explain.

No. The Project will not cause residents or businesses to relocate because the Project is wholly located on Airport property.

(O) LIGHT EMISSIONS AND VISUAL EFFECTS

Would the proposed project have the potential for airport-related lighting impacts on nearby residents? Explain.

No. The proposed solar installation will be located well within airport property and approximately 0.5 mile from the nearest residence. The solar arrays will be low profile and generally screened from view by existing structures or trees within or adjacent to airport property from viewing locations to the west and north. At a distance of 0.5 mile or more, residences to the south and east of the airport do not have direct views of the installation, but the arrays will viewed at a distance and in the context of the airport. As a result, the solar installation will not be a focal point to viewers and will not change existing views to any significant extent. Given the low profile of the arrays, the distance from which the installation will be viewed from residential areas and the existing character of the airport, the addition of the solar installation should have no impact on surrounding land uses and activities.

(P) NOISE

Will the project, when compared to the No Action alternative for the same timeframe, cause noise sensitive areas located at or above DNL 65 dB to experience a noise increase of at least DNL 1.5 dB? (Use AEM as a screening tool and INM as appropriate. See Airports Desk Reference, Chapter 17, for further guidance).

During construction, noise will be generated by construction equipment and vehicles, but no significant adverse noise impacts are anticipated from the operation of the solar arrays. In any case, construction noise will not exceed noise from aircraft operations. In 2012, the airport averaged 162 aircraft operations per day (AirNav.com, 2014).

Once installed, there will be no noise generated by the operations of the solar panels which convert sunlight to electricity using photovoltaics, as there are no exterior mechanical or moving components. ‘Crystalline’ PV modules will be used at all of the solar panel installations.

As noted previously, there may be periodic cleaning of the solar panels (up to twice annually, depending on the inspected surface conditions of the panels), and as-required seasonal snow and ice removal. Little noise, if any, will be discernable on and off-site from these temporary maintenance activities

(Q) SOCIAL IMPACTS

Would the proposed project cause an alteration in surface traffic patterns, or cause a noticeable increase in surface traffic congestion or decrease in Level of Service?

No. The Project’s construction plan and schedule will be coordinated with Suffolk County and the Airport Section E details the construction-related traffic management procedures to manage surface traffic patterns and surface traffic congestion. A reduction in the Level of Service is not anticipated because of the small number of construction vehicles utilizing surface roadways at peak travel periods.

(R) SOLID WASTE

Would the operation and/or construction of the project generate significant amounts of solid waste? If **Yes**, are local disposal facilities capable of handling the additional volumes of waste resulting from the project? Explain.

During construction, any solid waste generated by construction activities or construction labor will be bagged and transported off-site to a licensed landfill or waste repository. During its operation, the Proposed Action will have no direct or indirect impact on water supply, waste water or solid waste infrastructure at the airport.

(S) WATER QUALITY

(a) Does the proposed project have the potential to impact water quality, including ground water, surface water bodies, and public water supply system or federal, state or tribal water quality standards? (If **Yes**, contact appropriate agency and include record of consultation).

No. The Project will not have significant impact to water quality to groundwater, surface water, the public water supply system nor violate water quality standards because the project would not change the quantity or timing of runoff. Grass would be able to grow under the arrays and the only impermeable surfaces would be associated with the footings of each structure and inverter/transformer pads. The grass will be mowed 2-3 times during the growing season. The project will not require the use of area water and will have no direct or indirect impact on water supply.

(b) Is the project to be located over a designated Sole Source Aquifer? (If **Yes**, attach record of consultation with EPA).

There are no wetlands or surface water bodies at the proposed sites or vicinity. The sites are not within FEMA designated floodplains. The Airport is located within the Town of Southampton Aquifer Protection Overlay District (APOD) Critical Environmental Area (CEA) and adjacent to the Suffolk County Special Groundwater Protection Area (SPGA) CEA. The APOD and SGPA CEAs are primarily concerned with groundwater protection. The proposed solar installation should have no effect on groundwater.

The Airport is also located within the Town of Southampton APOD CEA. The APOD is primarily concerned with groundwater protection. Best Management Practices (BMPs) will be implemented during clearing activities as needed to protect area resources.

(T) WETLANDS

(a) Does the proposed project involve federal or state regulated or non-jurisdictional wetlands? (Contact USFWS or state agency if protected resources are affected) (Wetlands must be delineated using methods in the US Army Corps of Engineers 1987 Wetland Delineation Manual. Delineations must be performed by a person certified in wetlands delineation).

No wetlands or streams are present within or in the vicinity of the proposed northern solar arrays (see Figure 5). Neither of the sites is located within federal or NYSDEC wetlands, streams, or Federal Emergency Management Administration (FEMA) designated floodplains. The absence of wetlands and waterways, and predominantly level terrain reduce the potential for sedimentation and erosion. In addition, the limited duration of construction activities will minimize potential impacts to natural resources.

SunEdison will develop a Project-specific SWPPP which will include BMPs to protect surrounding natural resources during construction activities, including clearing. Potential BMPs that may be utilized during

construction include preserving naturally vegetated areas whenever possible, installing erosion and sediment controls such as silt fencing and hay bales, and mulching if appropriate.

(b) If yes, does the project qualify for an Army Corps of Engineers General permit? (Document coordination with the Corps).

(U) WILD AND SCENIC RIVERS

Would the proposed project affect a river segment that is listed in the Wild and Scenic River System or National Rivers Inventory? (If **Yes**, coordinate with the jurisdictional agency and attach record of consultation).

No. The Project is not located near a river segment that is listed in the Wild and Scenic River System.

(V) CUMULATIVE IMPACTS

Discuss impacts from past, present, and reasonably foreseeable future projects both on and off the airport. Would the proposed project produce a cumulative effect on any of the environmental impact categories above? Consider projects that are connected and may have common timing and/or location. For purposes of this Form, generally use 3 years for past projects and 5 years for future foreseeable projects.

No. The proposed solar installation at the Airport is unlikely to contribute to any significant adverse cumulative impacts in the local area. As noted in above sections, it is being developed within land that is previously disturbed and has limited other aviation-related development potential due to its proximity to airport runways. The Project will not require electricity for operation, rather it will contribute energy to the existing PSEG grid. It will not require the use of area water and sewer services nor will it require a significant long-term workforce that could increase growth and impact community facilities and services. As a result, even if other development projects are planned for this area, the small scale of the solar installation and its lack of consumption of public resources indicates that it would not contribute significantly to a cumulative impact in the local area or region. There are no anticipated significant adverse impacts associated with the proposed project area, and therefore no adverse cumulative impacts are expected to result from the implementation of the Proposed Action. There are no foreseeable future projects on and off the Airport that are related to the proposed Project.

7. PERMITS

List all required permits for the proposed project. Has coordination with the appropriate agency commenced and what is the expected time frame of receiving a permit?

SunEdison commenced coordination with the FAA, State, and local agencies regarding the permitting requirements for the Project. The Solar Glare Study will be submitted to the FAA for review in August 2015 with the revision to the Airport Layout Plan and the submission of Form 7460-1, Notice of Proposed Construction to the FAA during the summer of 2015.

SunEdison will prepare a State Pollution Discharge Elimination System General Permit for Construction Notice of Intent and a Stormwater Pollution Prevention Plan based upon the final site plans for the Project. The permit and plans will be submitted to the State for review and comment two months prior to the commencement of construction during the first quarter of 2016.

The State Environmental Quality Review document was submitted to the Suffolk County Department of Economic Development and Planning in June 2014. The Lease Agreement for the Project area was submitted to the Suffolk County Legislature for review during their July 2014 meeting. Site plans and a building permit application will be submitted to Suffolk County for review and approval in the fall 2015.

Required Agency Actions, Permits and Approvals

SunEdison will be required to obtain the following federal, state, and local approvals prior to commencement of construction. Table 5 identifies the required permits, reviews, and approvals needed to construct the proposed project.

Table 5. Required Permits, Approvals, and Reviews	
Federal	
Federal Aviation Administration (FAA)	<ul style="list-style-type: none"> • Revision to Airport Layout Plan • National Environmental Policy Act Review • FAA Form 7460-1, Notice of Proposed Construction • Solar Glare Analysis • Construction Safety Phasing Plan, AC 150/5370-2F
State	
New York State Department of Environmental Conservation (NYSDEC)	<ul style="list-style-type: none"> • State Pollution Discharge Elimination System General Permit for Construction Notice of Intent • Stormwater Pollution Prevention Plan
New York Natural Heritage Program (NYNHP)	<ul style="list-style-type: none"> • Threatened and Endangered Species Review
New York Office of Parks, Recreation, and Historical Preservation (OPRHP)	<ul style="list-style-type: none"> • Section 106 Cultural and Historic Resources Review and Consultation
Suffolk County	
Suffolk County Legislature	<ul style="list-style-type: none"> • Lease Agreement
Suffolk County Department of Economic Development and Planning	<ul style="list-style-type: none"> • State Environmental Quality Review
Suffolk County Department of Public Works	<ul style="list-style-type: none"> • Site Plan Review • Building Permit

In addition to the permits and approvals listed in Table 5, a solar glare analysis was conducted to determine the presence or absence of solar glare and glint potentially generated from the Project in compliance with the FAA's *Interim Policy on Solar Energy Projects at Federally Obligated Airports*. SunEdison used the newly released and FAA endorsed *Solar Glare Hazard Analysis Tool* (SGHAT) to predict when and where glare will occur from each prescribed PV array and deployed modules on the airport sites that have been designed to lower solar reflectance and therefore produce a reduced occurrence

of glare. The results from the Solar Glare Study have been submitted to the FAA under separate cover for review and comment.

8. MITIGATION

Describe those mitigation measures to be taken to avoid creation of significant impacts to a particular resource as a result of the proposed project, and include a discussion of any impacts that cannot be mitigated.

No mitigation is required because no significant impacts to a resource are anticipated from the construction of the Project.

9. PUBLIC INVOLVEMENT

Describe the public review process and any comments received.

Suffolk County government and the Airport Authority provided comment and recommendations regarding the proposed project in terms of existing biologic resources, vegetative management, access and transportation networks, and airport operations. The Airport Conservation and Assessment Committee, made up of community members, reviewed and commented on the project at a meeting held on July 15, 2014. The committee did not object to the project.

10. LIST OF ATTACHMENTS

- Figure 1: Site Location on Aerial with Photographs
- Figure 2: Site Location on United State Geological Survey Map
- Figure 3: Site Location on Aerial Image
- Figure 4: Existing Suffolk County Land Use Map
- Figure 5: Layout Plan of Solar Arrays
- Figure 6: Road Network for Airport Access
- Figure 7: Wetlands and Streams on the Airport Property
- Figure 8: Critical Environmental Areas (Pine Barrens)
- Figure 9: Environmental Justice Communities

Attachment 1: Correspondence Regarding Federally-Listed Species and Cultural Resources Consultations

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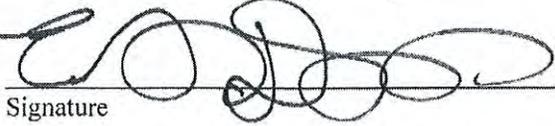
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Project Title: Photovoltaic Array at Francis S. Gabreski

Identifier: FOK

11. PREPARER CERTIFICATION

I certify that the information I have provided above is, to the best of my knowledge, correct.


Signature

19 NOV 2015
Date

Erin A. Degutis, RLA, AICP
Name

Senior Project Manager / TRC Solutions
Title

SunEdison's Consultant 303.395.4048
Affiliation Phone #

12. AIRPORT SPONSOR CERTIFICATION

I certify that the information I have provided above is, to the best of my knowledge, correct. I also recognize and agree that no construction activity, including but not limited to site preparation, demolition, or land disturbance, shall proceed for the above proposed project(s) until FAA issues a final environmental decision for the proposed project(s), and until compliance with all other applicable FAA approval actions (e.g., ALP approval, airspace approval, grant approval) has occurred.


Signature

11/20/15
Date

Anthony C. Reglis
Name

Airport Manager
Title

Francis S. Gabreski Airport (631) 852-8095
Affiliation Phone #