

Executive Orders Compliance Analysis –
Floodplain Management (EO11988) Document

Project 039-ED-33253-13 EO11988 Floodplain Management Determination
***Commercial & Economic Development Initiative within NY State Community Development Block
Grant–Disaster Recovery Program***
February 16, 2017

Introduction & Overview

The purpose of Executive Order 11988, Floodplain Management, is “to avoid to the extent possible the long- and short-term adverse impacts associated with occupancy and modification of floodplains and to avoid direct or indirect support of floodplain development wherever there is a practicable alternative.” This report contains the analysis prescribed by 24 CFR Part 55.

This project involves Community Development Block Grant Program–Disaster Recovery (CDBG-DR) funding for business infrastructure rehabilitation for a single business impacted by Hurricane Irene. The analysis that follows focuses on floodplain impacts, as there are no direct wetland impacts associated with this project. Based on the “non-substantial” level of work, and other case characteristics, it is concluded that there is a reasonable basis to proceed with funding for this project/ activity within floodplain. Moreover, in the [March 5, 2013 Federal Register Notice](#), HUD expressly recognized that “without the return of businesses and jobs to a disaster-impacted area, recovery may be impossible. Therefore, HUD strongly encourages grantees to envision economic revitalization as a cornerstone to a long-term recovery” (78 FR 14335). Thus, alternatives preventing or impeding small business recovery are not considered reasonable alternatives.

Description of Proposed Action & Land Use

Moore’s Mobile Home Park LLC., is a mobile home park. The property is at 14672 Main Street, Town of Prattsville, Greene County, NY. Based on Greene County data, the property is Section, Block, Lot 74.10-10.2-4. County records indicate that the property is 15.4 acres. The lot is comprised of open space and pads which host mobile homes as well as a separate motel business.

The proposed scope of work for this project is for a limited grant award \$150,000.00 in funding for future mitigation and construction-related activities for the removal of storm debris and the improvement of mobile home sites. Details of the future mitigation and construction-related activities will involve the clean-up of storm damaged mobile home lots and the improvement of existing mobile home sites. Vegetation that has grown in since Hurricane Irene will be cleared and debris deposited by the storm will be removed. Fill will be added to existing gravel mobile homes sites to increase elevation and to minimize the potential for future flooding. Thirteen (13) new concrete slabs will be installed at an increased elevation. Each lot where a slab is installed will be graded for positive drainage, seeded and mulched. The project will create a minimum of 28-inches of crawl space between the bottom of the mobile home floor joists to the concrete slabs which will allow for more efficient storm water runoff. With the combined grading and concrete foundation slab, the final elevation of the mobile homes on the elevated concrete slabs will be approximately two and a half feet above the 100-year base flood elevation. An existing manmade berm will be re-graded near existing mobile homes for better drainage of the area.

Applicable Regulatory Procedure Per EO 11988

The proposed action corresponds with a noncritical action not excluded under 24 CFR §55.12(b) or (c). Funding is permissible for the use in the floodplain if the proposed action is processed under §55.20 and the findings of the determination are affirmative to suggest that the project may proceed.

Based on online data, including data managed and updated by the U.S. Fish & Wildlife Service (USFWS) and New York Department of Environmental Conservation (NYSDEC), there are no mapped wetlands on the Subject Property. Thus, there was no direct construction (new or existing) in wetlands present at the

Subject Property. Thus, in accordance with the decision-making process set forth in 24 CFR Part 55, this analysis focuses exclusively on floodplains.

Using the total amount of damage reported after Hurricane Irene, this project does not exceed the substantial damage or substantial improvement threshold of 50% in 24 CFR §55.2(b)(10). This is evidenced by Program materials indicating that there was not a substantial damage determination and improved property value data shows the cost of funded repairs is a small fraction of the total value which is shown to be approximately \$792,000.00. As such, the abbreviated five-step floodplain determination process in §55.20 is allowed. The following analysis examines each step in a floodplain management determination process.

Step 1. Determine Whether the Proposed Action is Located in the 100-year Floodplain (500-year for Critical Actions) or results in New Construction in Wetlands.

The location of the proposed action, per the applicable FEMA flood map Firmette, is within 100-year floodplain (SFHA-AE Zone). Approximately 2.1 acres of floodplain will be disturbed during construction. There is an established Base Flood Elevation (BFE) of 1150-1157 across the property. Additionally portions of the property fall within Zone X. This action does not require a Section 404 permit under the Clean Water Act (see 55.20(a)(1)).

Step 2. Initiate Public Notice for Early Review of Proposal.

Because this project is located in floodplain, the Governor's Office of Storm Recovery (GOSR) is publishing an Executive Order 11988 Early Notice that provides for public and involved agency input on the decision to provide funding for construction mitigation at this location. Once an early public notice and comment period is complete, GOSR will assess, consider and respond to comments received individually and collectively for this project, however there were no comments received for this project.

The early notice and corresponding 15-day public comment period started on January 27, 2017 with the "Early Notice of a Proposed Activity in 100-Year Floodplain" being published in Catskill Daily Mail newspaper, with the 15-day period expiring at 5 pm on February 13, 2017. The notice targeted local residents, including those in the floodplain. The notice was also sent to the following state and federal agencies on January 27, 2017: Federal Emergency Management Agency (FEMA); USFWS; U.S. Environmental Protection Agency (EPA); U.S. Army Corps of Engineers (USACE); NYSDEC; and New York State Office of Emergency Management. The notice was also sent to Nassau County and the Town of Hempstead. (See **Appendices 1 and 2** of this EO 11988 Floodplain Management Determination for the letter distributed to these agencies and the associated newspaper notice affidavit).

Step 3. Identify and Evaluate Practicable Alternatives to Locating the Proposed Action in a 100-year Floodplain (or 500-year Floodplain if a Critical Action) or Wetland.

The Program is structured to provide eligible businesses with loan or grant assistance for activities necessary to restore storm-damaged businesses, including through damage reimbursements, and support for rehabilitation, reconstruction, elevation, and/or other mitigation activities. This small business suffered damage during Hurricane Irene, and the proposed mitigation work qualifies as substantial improvement. As such, potential alternatives must be considered versus development in floodplain in order to try and mitigate the amount of damage from future flood events.

One alternative could be relocating the business out of 100-year floodplain. The Prattsville NYRCR Plan elucidates difficulties that this option poses; mainly, there is a scarcity of developable land within the area. Though much of the surrounding area is open space, forests, or farmland, the majority of land is owned by New York State as part of the Catskill Forest Reserve or by the NYC Department of Environmental Protection (DEP). Additionally, property costs have been driven up in the area due to competition from second-home buyers. Portions of the existing property that are not in floodplain are

primarily developed with mobile homes and there is very little space available to allow for moving the existing pad sites to a new location on the property. Thus, this alternative is not considered feasible for a business which operates on approximately 15.4 acres of land.

An additional alternative is to promote a buyout of the business. This plan does not support business continuity at this location nor does it support this area as a camp area for mobile home site. Thus, it does not support the community plan, which is to promote and support recreational and heritage tourism. Moreover, a buyout of this business would represent a tax loss to the Town of Prattsville that would have to be restored by some other means. The loss of this tax base could cause a significant financial gap in the Town's budget (*NYRCR Prattsville*, page 4-28). Moreover, a buyout would not enable introduction of resiliency measures on this property as the owner is able to absorb costs. Thus, this alternative is not considered a desirable option and it may be impracticable.

The no action option would mean the applicant would not be receiving grant funds to restore and sustain the business. There would be a potential inability for the business to survive and rebuild after the storms. Furthermore, the ability for the owner to successfully prevent against and mitigate any future damages from floods would be impeded due to the lack of financial support. The entire property would continue to be vulnerable to future flood damages. This could greatly impact this business and the surrounding community, as recovery would be greatly impaired due to lack of support. Accordingly, the 'no action' decision would neither support this business's recovery nor help the community recover from the devastating storms.

Due to the limited land available for development in this area, prohibition of rehabilitation within floodplain is not practicable. Applicants who choose to rebuild substantially damaged structures within floodplain using CDBG-DR grant funds must adhere to the elevation requirements in order to mitigate or avoid future damages.

The above identified alternatives will be re-evaluated in response to public comments received.

Step 4. Identify & Evaluate Potential Direct & Indirect Impacts Associated with Occupancy or Modification of 100-year Floodplain and Potential Direct & Indirect Support of Floodplain and Wetland Development that Could Result from Proposed Action.

The focus of floodplain evaluation should be on adverse impacts to lives and property, and on natural and beneficial floodplain values. Natural and beneficial values include consideration of potential for adverse impacts on water resources such as natural moderation of floods, water quality maintenance, and groundwater recharge.

According to the FEMA Report - *A Unified National Program for Floodplain Management*, two definitions commonly used in evaluating actions in floodplain are "structural" and "non-structural" activities. Per the report, structural activity is usually intended to mean adjustments that modify the behavior of floodwaters through the use of measures such as public works dams, levees and channel work. Non-structural is usually intended to include all other adjustments (e.g., regulations, insurance, etc.) in the way society acts when occupying or modifying a floodplain. These definitions are used in describing impacts that may arise in association with potential advancement of this case.

Natural moderation of floods

As the Applicant's site is one of multiple developed parcels situated within 100-year floodplain, the continued occupancy may potentially result in future direct impacts to property during certain severe floods and related natural disasters. However, the direct effects to this property would be no greater than those expected to the other adjacent occupied properties within this floodplain. Moreover, the effects to this property could be reduced due to the nature of the proposed use, which is for mobile homes which

has been elevated to allow for better stormwater drainage and can be potentially removed from the floodplain in the event of a predicted storm and flood.

Living resources such as flora and fauna

This land use may constitute a type of business where, after flooding, materials used in operations could potentially be released into the environment, thereby having unquantifiable potential to impact water quality maintenance and ecological resources. A potential impact that may arise is that materials used or stored on-site would be caused to be released into the environment, such as a result of wind or floodwaters. However, this would be more likely if there are not non-structural and structural floodproofing techniques in place, such as if materials are not stored in water-tight containers, and/or said containers break or migrate out of a non-enclosed building(s) due to lack of proper preparation. As this site consists of open space and pads for mobile homes, a qualitative evaluation suggests the potential would be relatively small and if such releases do occur, it is likely as part of a potential area-wide impact. In such an instance, floatable debris could contribute to litter and if there were minor amounts of chemicals used on site, floodwaters may induce rapid dilution. Given the nature of this business, the potential for an acute or chronic level of water quality impact from this site is low.

Impacts to Property & Lives

The action does present potential to impact commercial occupancy of floodplain, but it does not involve permanent residential structures. Moreover, supporting the recovery of small businesses is an essential component of recovery in storm-affected communities, as recognized by the March 2013 Notice in the Federal Register.

Occupancy of floodplain in this area has taken place over an extended period. Per the 2014 New York Hazard Mitigation Plan, Greene County has been declared a major disaster area three (3) times from 1954-2012. Given the context of the area—this action represents an activity at only one parcel among many that are located within contiguous floodplain. Also, the business will provide space for recreational vehicles and therefore, it is a land use that supports recreation and tourism. Thus, funding this project/activity does constitute continued support of floodplain development. In the event of severe flooding and associated natural hazards in the future, there is potential for further damage to this property, business disruption, and impacts to this small business.

The rehabilitation of the Subject Property sustains area property values and community character within an established district and neighborhood. It enables continued viability of this small business, which might otherwise degrade, or cease to exist, without support in rehabilitating facilities, restarting business operations, and/or recouping some revenue lost as a result of the disaster. Similarly, the proposed investment supports the area economy by sustaining an asset. With sustained operations here, customers are not required to travel greater distances, and the Town will retain a business that contributes to their tax base. Support to sustain this business also helps ensure a diverse economic base. If this project/activity were not funded, there probably would be other undefined, undesirable indirect impacts to lives and the area economy, on a short- and long-term basis, such as relating to economic multipliers and support that this business provides to surrounding businesses, as it purchases products and services.

Cultural resources such as archaeological, historic & recreational aspects

The State Historic Preservation Office has confirmed the project will not affect historic properties on December 1, 2016. Project information was sent to the THPO of the Delaware Nation, Delaware Tribe of Indians, Mohawk Nation Council of Chiefs of Haudenosaunee Six Nations Confederacy, St. Regis Mohawk Tribe, and Stockbridge-Munsee Community Band of the Mohicans on December 22, 2016 for a determination if there are any significant cultural resource concerns with this project. Any response received from the THPO of the Delaware Nation, Delaware Tribe of Indians, Mohawk Nation Council of Chiefs of Haudenosaunee Six Nations Confederacy, St. Regis Mohawk Tribe, and Stockbridge-Munsee

Community Band of the Mohicans will be incorporated into the requirements under this environmental review record, in **Attachment 4**.

Agricultural, aquacultural, & forestry resources

The Greene County area has agricultural sites located in the flood zone, as well as 705,500 acres of undeveloped woodlands (according to Greene County's website) some of which are located in flood zone. It is possible that if there is a materials release from this property, it could potentially affect natural resources including agricultural and forestry. However, while it is conceivable that flooding of a business like this could be part of a cumulative influence on such resources, the impact attributable to this use could not have been quantitatively derived, and the potential impact, with planning for and practice of non-structural management practices, is considered minor.

Step 5. Where Practicable, Design or Modify the Proposed Action to Minimize the Potential Adverse Impacts To and From the 100-Year Floodplain and to Restore and Preserve its Natural and Beneficial Functions and Values.

Given that proposed rehabilitation funded by this program is very limited and does not rise to the level of substantial reconstruction, and considering the individual property scale, it is not financially feasible to specify additional mitigation measures, such as dry floodproofing buildings or promoting strategic retreat such as through government acquisition. However, it is reasonable to promote business owner awareness of future risks of natural hazards, including flooding, plus the physical, social and economic impacts that potential events could convey, including through potential for future physical damage to property, buildings, supplies, and equipment.

It is reasonable to promote business owner awareness of actions they can take to define and prepare for the impacts of many hazards they may face. There are free resources available to aid such preparedness planning found at the link: <http://www.ready.gov/business>.

Step 6. Reevaluate the Alternatives and Proposed Action.

The relocation alternatives within floodplain are not feasible because of the scope of rebuilding requirements and cost (raising mobile home pad sites). The location of this community within an area owned primarily by New York State and New York City, meaning there are limited developable spaces available. Relocation alternatives outside of floodplain and/ or the buyout alternative are not readily feasible because areas outside flood zone are costly to secure since land out of floodway is limited. Locations outside of floodplain are already occupied, serving developed businesses and residences.

The 'no action' alternative would not address the need this business has for help in funding their rehabilitation. Without the grant funding, the business could be unable to successfully complete restoration of the basic business service facilities and it would remain vulnerable to damage in future flooding events.

Therefore, the alternatives examined are not considered desirable or possible and the action to fund rehabilitation and business continuity at this business is still practicable in light of exposure to flood hazards in floodplain, possible adverse impacts on floodplain, the extent to which it may aggravate current hazards to other floodplains, and the potential to disrupt natural and beneficial functions and values of floodplains. Moreover, the [March 5, 2013 Federal Register Notice](#) strongly recommends that grantees engage in a robust policy for ensuring recovery of small business affected by storm events, as such recovery is essential to the continued vitality of surrounding communities. Thus, alternatives preventing or impeding small business recovery are not considered reasonable alternatives. Furthermore, an award under this Program requires that all substantially improved structures adhere to the NFIP regulations. As such, the impact on floodplain would be less than with the identified 'alternatives.

The impacts of these alternatives will be re-evaluated in response to any public comments received.

Step 7. Issue Findings and Public Explanation.

It is the finding of this report that there is no better alternative than to provide funding for the rehabilitation and mitigation at this small business. The location within floodplain cannot be avoided due to the limited land availability and cost of land outside of floodplain. However, not funding any actions would mean that this small business would struggle to recover, much less be able to mitigate any future damages. A final notice, formally known as “Notice of Policy Determination” was published in accordance with 24 CFR 55, for a 7-day comment period. (See **Appendix 3** of this EO 11988 Floodplain Management Determination for the letter distributed to the associated agencies and the associated newspaper notice affidavit). The 7-day comment period started with the Final Notice publishing in the Catskill Daily Mail newspaper on February 16, 2017 and the 7-day period expires at 5 pm on February 23, 2017. The notice describes the reasons why the project must be located in the floodplain, alternatives considered, and all mitigation measures to be taken to minimize adverse impacts and preserve natural and beneficial floodplain values.

Step 8. Continuing Responsibility of Responsible Entity & Recipient.

The responsible entity will make available educational materials regarding best practices for businesses located in floodplains. It will also require the business to demonstrate proof of current flood insurance, when applicable. It is acknowledged there is a continuing responsibility by the responsible entity, New York State Housing Trust Fund/ Division of Homes and Community Renewal, to ensure, to the extent feasible and necessary, compliance with the requirements herein.

Appendix 1

Notice of Early Public Review Floodplain Management Executive Order 11988



**EARLY NOTICE OF A PROPOSED ACTIVITY
IN A 100-YEAR FLOODPLAIN**

**MOORE'S MOBILE HOME PARK L.L.C. (039-ED-33253-2013)
14672 ROUTE 23, TOWN OF PRATTSVILLE,
GREENE COUNTY, NEW YORK
JANUARY 27, 2016**

To: All interested Agencies, Groups, and Individuals

This is to give notice that the Governor's Office of Storm Recovery (GOSR), an office of the New York State Housing Trust Fund Corporation (HTFC), has received a request to use Community Development Block Grant – Disaster Recovery (CDBG-DR) funding from the NY Rising Small Business Recovery Program to implement rehabilitation and mitigation the Moore's Mobile Home Park L.L.C. (hereinafter, the "Proposed Activity") and is conducting an evaluation as required by Executive Order 11988 in accordance with U.S. Department of Housing and Urban Renewal (HUD) regulations (24 CFR Part 55). There are three primary purposes for this notice. First, to provide the public an opportunity to express their concerns and share information about the Proposed Activity, including alternative locations outside of the floodplain. Second, adequate public notice is an important public education tool. The dissemination of information about floodplain facilitates and enhances governmental efforts to reduce the risks associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the government determines it will participate in actions taking place in floodplain, it must inform those who may be put at greater or continued risk. Funding for the Proposed Activity will be provided by the HUD CDBG-DR program for storm recovery activities in New York State.

The Proposed Activity is needed to address flooding that resulted in mobile homes washing away during Hurricane Irene. The proposed activities involve mitigation to minimize potential damage from future storm events.

The Proposed Activity will include future mitigation and construction-related activities involving the clean-up of storm damaged mobile home lots and the improvement of existing mobile home sites, which will result in permanent impacts to approximately 2.1 acres of 100-Year Floodplain. Vegetation that has grown in since Hurricane Irene will be cleared and debris deposited by the storm will be removed. Fill will be added to existing gravel mobile homes sites to increase elevation and to minimize the potential for future flooding. Thirteen (13) new concrete slabs will be installed at the increased elevation. Each lot where a slab is installed will be graded for positive drainage, seeded and mulched. The project will create a minimum of 28-inches of crawl space between the bottom of the mobile home floor joists to the concrete slabs, to allow for more efficient storm water runoff. With the combined grading and concrete foundation slab, the final elevation of the mobile homes on the elevated concrete slabs will be approximately two and a half feet above the 100-year base flood elevation. An existing manmade berm will be re-graded near existing mobile homes for better drainage of the area.

Floodplain maps based on the FEMA Flood Insurance Rate Maps have been prepared and are available for review with additional information at: <http://www.stormrecovery.ny.gov/environmental-docs>.

Any individual, group, or agency may submit written comments on the Proposed Activity or request further information by contacting Lori A. Shirley, Certifying Officer, Governor's Office of Storm Recovery, 38-40 State Street, Hampton Plaza, Albany, NY 12207; email: NYSCDBG_DR_ER@nyshcr.org. Standard office hours are 9:00 AM to 5:00 PM Monday through Friday. For more information, call (518) 474-0755. All comments received by 5pm on February 13, 2017 will be considered.

Appendix 2

Notice of Early Public Review Affidavit Floodplain Management Executive Order 11988

Appendix 3

Final Notice Floodplain Management Executive Order 11988



**Governor's Office of
Storm Recovery**

ANDREW M. CUOMO
Governor

LISA BOVA-HIATT
Executive Director

PUBLIC NOTICE
FINAL NOTICE AND PUBLIC REVIEW OF A PROPOSED ACTIVITY
IN A 100-YEAR FLOODPLAIN

MOORE'S MOBILE HOME PARK L.L.C. (039-ED-33253-2013)
14672 ROUTE 23, TOWN OF PRATTSVILLE,
GREENE COUNTY, NEW YORK
FEBRUARY 16, 2017

Name of Responsible Entity and Recipient: New York State Homes and Community Renewal (HCR), 38-40 State Street, Hampton Plaza, Albany, NY 12207, in cooperation with the New York State Housing Trust Fund Corporation (HTFC), of the same address. Contact: Lori A. Shirley (518) 474-0755.

Pursuant to 24 CFR Section 58.43, this Final Notice and Public Explanation of a Proposed Activity in a Floodplain satisfies the procedural requirement for project activities proposed to be undertaken by HCR.

Project Description: The Governor's Office of Storm Recovery (GOSR), an office of HCR's HTFC, is responsible for the direct administration of the United States Department of Housing and Urban Development (HUD) Community Development Block Grant – Disaster Recovery (CDBG-DR) program in New York State. GOSR proposes to provide CDBG-DR funding to Moore's Mobile Home Park L.L.C., which is located at 14672 Route 23, Town of Prattsville, Greene County, New York 12468. HUD CDBG-DR funding of \$150,000.00 for future mitigation and construction-related activities involving the clean-up of storm damaged mobile home lots and the improvement of existing mobile home sites (the "Proposed Project"). Vegetation that has grown in since Hurricane Irene will be cleared and debris deposited by the storm will be removed. Thirteen (13) new concrete slabs will be installed at an increased elevation. Each lot where a slab is installed will be graded for positive drainage, creating a minimum of 28-inches of crawl space between the bottom of the mobile home floor joists to the concrete slabs, to allow for more efficient storm water runoff. With the combined grading and concrete foundation slab, the final elevation of the mobile homes on the elevated concrete slabs will be approximately two and a half feet above the 100-year base flood elevation. An existing manmade berm will be re-graded near existing mobile homes for better drainage of the area.

This work will be located in 100-year floodplain (SHFA Zone AE). Approximately 2.1 acres of floodplain will be disturbed during construction. Since the action will include new construction in floodplain, Executive Orders 11988 require that the project not be supported if there are practicable alternatives to development in floodplain.

There are three primary purposes for this notice. First, people who may be affected by activities in floodplains and those who have an interest in the protection of the natural environment have an opportunity to express their concerns and provide information about these areas. Second, adequate public notice is an important public education tool. The dissemination of information and request for public comment about floodplains can facilitate and enhance federal efforts to reduce the risks associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the federal government determines it will participate in actions taking place in floodplains, it must inform those who may be put at greater or continued risk.

Public Review: Public viewing of the Floodplain Management Documents are available online at <http://stormrecovery.ny.gov/environmental-docs> and are also available in person Monday – Friday, 9:00 AM – 5:00 PM at the following address: Governor’s Office of Storm Recovery, 38-40 State Street, Hampton Plaza, Albany, NY 12207. Contact: Lori A. Shirley (518) 474-0755.

Further information may be requested by writing to the above address, emailing NYSCDBG_DR_ER@nyshcr.org or by calling (518) 474-0755. This combined notice is being sent to individuals and groups known to be interested in these activities, local news media, appropriate local, state and federal agencies, the regional office of the U.S. Environmental Protection Agency having jurisdiction, and to the HUD Field Office, and is being published in a newspaper of general circulation in the affected community.

Public Comments on the Proposed Activity within Floodplain: Any individual, group or agency may submit written comments on the Project. The public is hereby advised to specify in their comments which “notice” their comments address. Comments should be submitted via email, in the proper format, on or before February 23, 2017 at NYSCDBG_DR_ER@nyshcr.org. Written comments may also be submitted at the following address, or by mail, in the proper format, to be received on or before February 23, 2017: Governor’s Office of Storm Recovery, 38-40 State Street, Hampton Plaza, Albany, NY 12207. Comments may be received by telephone by contacting Lori A. Shirley at (518) 474-0755. All comments must be received on or before 5 pm on February 23, 2017 or they will not be considered. If modifications result from public comment, these will be made prior to proceeding with the expenditure of funds.

Objections must be prepared and submitted in accordance with the required procedures (24 CFR Part 58) and shall be addressed to Tennille Smith Parker, Director, Disaster Recovery and Special Issues Division, Office of Block Grant Assistance, U.S. Department of Housing & Urban Development, 451 7th Street SW, Washington, DC 20410, Phone: (202) 402-4649.

Lori A. Shirley
Certifying Officer
February 16, 2017