

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

**Petition of BNE Energy Inc. for a  
Declaratory Ruling for the Location,  
Construction and Operation of a 4.8 MW  
Wind Renewable Generating Project on  
Winsted-Norfolk Road in Colebrook,  
Connecticut (“Wind Colebrook North”)**

**Petition No. 984**

**April 27, 2011**

**SUPPLEMENTAL PRE-FILED TESTIMONY OF D. SCOTT REYNOLDS, PH.D.**

**Q8. You have previously filed testimony in this proceeding. Why are you submitting this supplemental testimony?**

A8. Following the date my pre-filed testimony was due, I received information from the petitioner, BNE Energy Inc. (“BNE”), including pre-filed testimony of some of its witnesses and interrogatory responses related to my pre-filed testimony. I am submitting this additional pre-filed testimony to provide the Council with my analysis of this new information.

**Q9. Did you review BNE’s responses to FairwindCT’s second set of interrogatories in this proceeding?**

A9. Yes.

**Q10. In your professional opinion, do you have any concerns with BNE’s responses?**

A10. Yes.

**Q11. Please identify the interrogatory responses that you are concerned about. Please comment on each response identified.**

A11. Each interrogatory response of concern is addressed below:

*Q44. Please provide the professional experience of Vanesse Hangen Brustlin, Inc. ("VHB") field personnel in conducting habitat assessments for forest-roosting bats.*

*A44: BNE objects to this interrogatory because the information requested is irrelevant as VHB was not retained to conduct habitat assessments for forest-roosting bats.*

Comment: BNE claims that the pre-construction assessment conducted at Colebrook North was "in accordance with the United States Fish and Wildlife draft wind turbine guidelines, tiers one through three recommended assessments" (Tidhar, Pre-Filed Testimony). The Tier Two (Site Characterization) guidelines clearly states that a proper pre-construction assessment requires site-specific details with at least one reconnaissance-level site visit by a wildlife biologist to evaluate habitat and potential bat resources, including roosting habitat for bats (USFWS, 2010). As VHB was the consultant BNE retained to conduct the Site Characterization, it is relevant and appropriate to determine how this work was done and whether the people retained to do such work were qualified. However, the VHB report clearly states that their habitat survey was limited to the impact analysis of "terrestrial wildlife"; this position was confirmed by BNE's response in A44 that VHB "was not retained to conduct habitat assessments for forest-roosting bats". Therefore, it is clear that no Site Characterization was conducted for forest-roosting bats, and consequently no Tier Two Site Assessment for bats was conducted at the project site despite the sworn testimony of David Tidhar. This is despite the fact that VHB identified over 100 large-diameter snags and several

habitats that are likely to attract foraging or roosting bats throughout the project area.

*Q50. Please explain how the 96.2% acoustic sampling rate was calculated (Exhibit K, pg. 7).*

*A50: The requested data is available in Exhibit K and final sampling rate is included in the final bat acoustic survey report, attached to the pre-filed testimony of David Tidhar. The sampling rate included in the report is 80.3%.*

Comment: The Executive Summary of the Report, attached in Mr. Tidhar's pre-filed testimony does indeed state that the overall sampling rate at the Colebrook South site was 80.3%. However, this is an intentional mischaracterization of the data. The original scope of work called for two monitoring stations at the CWRA South project site from June 25 through November 01, 2010, for a total of 130 nights, or 260 detector-nights (2 detectors for 130 nights each). However, the total sampling was only 102 detector-nights, or 39.2% of the original study design. Adding the SM2Bat system to the overall sampling effort (successful on 30 of 43 detector nights), yields a combined 132 detector nights out of a proposed 303 detector-nights. This yields an overall recording rate of 43.6%, an extremely low sampling rate that is not made very explicit in the Report. Given the inherent flaws in the study design, and the complete lack of sampling at the Colebrook North site, failing to achieve 44% of the original scope of work is not adequate to characterize the project site. Therefore, WEST did not meet any recognized level of

scientific acceptability in its' study design and failed to meet the Tier III objectives of the USFWS Wind Siting Guidelines.

*Q57. Please identify the state or federal sampling guideline that was used to develop the sampling protocol at the CWRA project site (Exhibit K).*

*A57: Survey protocols and analysis methods used were consistent with approaches used across the country for pre-construction wind-energy studies (e.g. Cape Vincent Wind, New York) and recommended in state (e.g. New York, Pennsylvania, Maine) guidelines and federal (FACA 2010 draft) recommendations, as well as by scientists working in the fields of bat bio-acoustics and bat ecology (e.g. Kunz et al. 2007, Arnett et al. 2008, Brintsky 2004).*

Comment: BNE states in their response that the protocol used at the CWRA site would meet the pre-construction monitoring guidelines of New York (NYDEC, 2007), Pennsylvania (PAGC, 2007), and Maine (Jones, 2006). This, however, is completely false. As I stated in my Pre-filed Testimony, the NYDEC Guidelines recommends a full year of acoustic monitoring and specifically recommends the use of met towers; when ground-based acoustics must be used, they specifically limit this use for summer monitoring and state that the systems should be active (hand-held) and mobile, and not passive and stationary as used at the CWRA. Similarly, the Pennsylvania Wind Siting Guidelines (PAGC, 2007) have a minimum requirement for acoustic monitoring using met-tower based monitors for one full year. The PAGC does not recommend or support the use of ground-based acoustic monitoring for pre-construction sampling.

Lastly, the Maine Windpower Advisory Group (Jones, 2006) recommends sampling at elevated platforms for an entire year of bat activity. It is unclear how BNE could have read these guidelines and still claim to have followed them. Furthermore, the citations provided by BNE to support their protocol (Kunz et al. 2007; Arnett et al. 2008, and Britzke 2004) do not, in any way, support ground-based acoustic monitoring for wind-energy risk assessment. Lastly, the only study cited by BNE in their response was the Cape Vincent Wind project in New York. What they fail to elucidate in their response is that the Cape Vincent Wind Project was a three turbine project adjacent to another three turbine project (similar to Colebrook South and Colebrook North). At that project, WEST's study protocol recommended met tower-based sampling using multiple detectors at each project site, with additional ground monitors in locations likely to have high bat activity (such as wetlands and forest edge habitat). In other words, the Cape Vincent monitoring protocol, in contrast to the Colebrook study, did meet state and federal sampling guidelines and are consistent with what bat biologists recommend at project sites throughout the country. BNE clearly did not read the Cape Vincent study proposal because it completely undermines BNE's claim that the monitoring study at Colebrook was adequate, well-designed, or consistent with any state or federal sampling guidelines.

*Q58. Does the acoustic sampling protocol used at the CWRA project site meet the temporal, spatial, or vertical sampling criteria identified by the*

*Wind Siting Guidelines of the Pennsylvania Game Commission (Exhibit K)?*

*A58: BNE objects to this interrogatory because the information requested is irrelevant. Specifically, BNE notes that the Project is not located in the state of Pennsylvania and therefore does not have to comply with such standards.*

Comment: BNE states in their response to Question 57 of the interrogatories that the "survey protocols and analysis methods used were consistent with approaches used across the county... and recommended in state (e.g. New York, Pennsylvania, Maine) guidelines...". Given that BNE is claiming that the Pennsylvania guidelines are relevant, it is unclear how BNE can then claim that they are irrelevant. Simply stated, Question 58 of the interrogatories asks "does your acoustic sampling protocol meet the Pennsylvania wind siting guidelines?"; BNE states in A57 that the CWRA protocol is consistent with the Pennsylvania guidelines, but refuses to answer Question 58 in the affirmative. The reason for that refusal is simply because it does not meet the standards set forth in the Pennsylvania guidelines.

*Q59. Does the acoustic sampling protocol used at the CWRA project site meet the temporal, spatial, or vertical sampling criteria identified by the pre-construction monitoring guidelines of the New York Department of Environmental Conservation (Exhibit K)?*

*A59: BNE objects to this interrogatory because the information requested is irrelevant. Specifically, BNE notes that the Project is not located in the*

*state of New York and therefore does not have to comply with such standards.*

Comment: BNE states in their response to Question 57 of the interrogatories that the "survey protocols and analysis methods used were consistent with approaches used across the county... and recommended in state (e.g. New York, Pennsylvania, Maine) guidelines...". Given that BNE is claiming that the New York guidelines are relevant, it is unclear how BNE can then claim that they are irrelevant. Simply stated, Question 59 of the interrogatories asks "does your acoustic sampling protocol meet the New York pre-construction monitoring guidelines?"; BNE states in A57 that the CWRA protocol is consistent with the New York guidelines, but refuses to answer Question 59 in the affirmative. The reason for that refusal is simply because it does not meet the standards set forth in the New York DEC guidelines.

In both Questions 58 and Question 59, BNE is using geography to obscure the fact that their acoustic monitoring protocol does not meet the written guidelines of any state, federal, or research entity. In the BNE Petition, David Tidhar's Pre-filed testimony, and their interrogatory responses, BNE never explicitly identifies a single state guideline that would be met by the CWRA sampling protocol. Furthermore, they grossly mischaracterize the Bats and Wind Energy Cooperative (BWEC) recommendations cited as Kunz et al. (2007) and Arnett et al. (2008); given that three different WEST employees are co-authors of these citations, it is hard to understand how this mischaracterization could be accidental.

*Q65. Given that WEST's species-specific analysis only identified 0.1% of the MF bat calls and 0.2% of the LF bat calls, do you feel that the conclusions made regarding eastern red bat and hoary bat activity at the CWRA project site are indicative of the overall activity of these species?*

*A65: It is certainly possible. While both species are geographically widespread, they may not be locally abundant. For example, Brooks (2011) reported that 7% of passes recorded in Massachusetts were from red or hoary bats.*

Comment: Any conclusion based on 0.3% of the available data is statistically and ecologically invalid. BNE defends the WEST report by suggesting that the conclusions made regarding the two most frequently-killed bats (the red bat and hoary bat) are "certainly possible". Although this is not a strong support of these conclusions, the main point is that BNE fails to address the actual question: are conclusions based on only 0.3% of the available data statistically or ecologically appropriate? The answer would clearly be 'No'; failures of their categorization criteria are not an excuse. If the criteria do not work, they should be abandoned for the more conservative approach that WEST justifies at the beginning of their report.

*Q66. Was there a meteorological tower at the CWRA project site throughout the entire acoustic monitoring survey period? If yes, please explain why ground microphone systems were used to monitor bat activity*

*when there was a meteorological tower on site that could have sampled within the rotor swept area.*

*A66. Yes, there was a meteorological (MET) tower installed at the Site, however, there are certain risks including safety risks and the potential damage to the Met-tower that could arise from lowering the tower to install bat monitoring equipment. Lowering the tower could also result in delays to bat monitoring activities given the time needed to lower the tower and the potential risks associated with it. After consulting with WEST on the various issues regarding bat monitoring equipment, including the concerns referenced above, BNE determined that ground-based monitoring equipment was appropriate for the Site. Ground-based Anabat sampling has been a standard component of preconstruction acoustic bat monitoring at commercial wind-energy sites for several years. Over recent years, scientists working in this field (e.g. Kunz et al 2007, WEST) have recommended acoustic sampling within the rotor swept zone, however, this is not always possible because elevating detectors to sufficient height may not be feasible because: 1) suitable structures may not be present, or 2) because suitable structures may not be altered without risking damage to the structure or other equipment. At the Site, the second scenario was the reason why an elevated detector could not be deployed – placement of a detector (or means of elevating a detector such as a Bat Hat system) would have required lowering the meteorological tower to the ground which may have damaged meteorological instrumentation and resulted in study delay and additional significant costs, respectively. Due to this reason, two ground based detectors were*

*deployed at the Project - one was located in an existing forest clearing while the second was located at a proposed turbine location. This sampling design allowed for comparative analysis between bat activity at a proposed turbine location with an open canopy clearing.*

*A current conclusion reached by biologists working in the field of wind-energy/wildlife interactions is that bat activity indices derived from pre-construction acoustic studies show a rough correlation with post-construction fatality patterns (see final bat report and NWCC 2010). This conclusion is largely based on ground-based Anabat sampling.*

Comment: As already clearly stated, ground-based Anabat sampling is not a standard component of any state, federal, or NGO pre-construction monitoring program; reiterating this error in multiple places and at multiple Siting Council proceedings does not make it less inaccurate. BNE claims that ground-based monitoring "has been a standard component of pre-construction acoustic bat monitoring at commercial wind-energy sites for several years" is wrong. It was a standard evaluation tool prior to the development of met tower-based monitoring in 2005. WEST knows through direct experience that BNE's statement is inaccurate and I have not seen any reports where WEST has recommended not using met towers when they are available. BNE does not provide any justification for failing to lower the met towers beyond the assumption that it "may have damaged meteorological instrumentation", "result in delays to bat monitoring activities" and create "additional significant costs". However, BNE fails to state that lowering met towers to service the meteorological equipment and to attach bat acoustic detectors

is a standard industry practice. NEES was the first to deploy met tower-based microphones for pre-construction risk assessment; I have been involved in the lowering of over one hundred towers throughout my career without ever seeing damage to a single tower or piece of meteorological equipment. The fact that BNE also failed to lower the met tower at the Prospect, CT wind site suggests that the decision to not use the met tower was a management decision based on cost, not concern for data loss. This is not, in my opinion, a reasonable excuse for failing to follow accepted scientific protocols. Beyond my opinion, the Wind Turbine Guidelines Advisory Committee states, in the *Bat Survey Methods* of the USFWS Guidelines that "[d]evelopers should evaluate whether it would be cost effective to install detectors when met towers are first established on a site. Doing so might reduce the cost of installation later and might alleviate time delays to conduct such studies." The fact that BNE failed to do this (install the monitors at the time of the tower installation) is not a reasonable excuse for failing to follow scientifically accepted protocols.

*Q71. Please summarize the effort that was conducted to reach the conclusion that the "CWRA is not in the vicinity of any known bat colonies or features likely to attract large numbers of bats" (Exhibit K, pg. 13).*

*A71. See response to Q67.*

Comment: BNE's response summarized their re-interpretation of words such as 'colony' and 'critical habitat' to suggest that their conclusion that bats are unlikely to use the Colebrook project site is accurate. In order to re-define these words in a manner favorable to their conclusion, BNE

had to concede that open water habitat "generally have high levels of activity relative to surrounding non-hydric areas" (Answer A69) and that open water "likely would be used for foraging" (Answer A70).

Unfortunately, BNE chose not to sample any of these habitats at either the Colebrook South or Colebrook North project sites. Given the low sampling rate and the failure to sample within likely high-activity habitats within Colebrook South and the complete absence of data on bat activity at Colebrook North, it is unclear how BNE can make any statements regarding the impact of the project site on regional bat populations.

*Q76. Given the abundance of large diameter hardwood trees at the Colebrook North project site, what effort was made to document tree-roosting bat activity in the secondary-growth northern hardwood forest habitat?*

*A76. Acoustic bat surveys were not completed at Colebrook North in 2010. Pre-construction acoustic surveys are planned to be completed at Colebrook North between April 15 - October 31, 2011. In addition, BNE has committed to complete post-construction bat fatality monitoring in addition to post-construction acoustic monitoring surveys. See also responses to Q74 and Q75.*

Comment: BNE has stated in previous testimony that it will conduct additional pre-construction acoustic monitoring at both Colebrook South and Colebrook North. It has also stated that it will continue to rely on ground-based acoustic monitoring. Given that BNE has either ignored or chosen to be ignorant of the current research practices in this field, I

would strongly recommend that the Siting Council require an independent Technical Advisory Committee (TAC) to design both the pre-construction and post-construction acoustic monitoring protocol. TAC composition should include competent and independent bat biologists that are familiar with the wind development issue, state and federal wildlife biologists who are responsible for determining the appropriateness of a survey technique, a statistician to ensure appropriate analyses and interpretation are produced, and third-party groups that have an interest in ensuring that the best available methods are employed.

**Q12. Did you review the pre-filed testimony of David Tidhar in this proceeding?**

A12. Yes.

**Q13. Would you like to respond to anything in Mr. Tidhar's testimony?**

A13. Yes. Page 4 of the testimony states that, "WEST conducted both the breeding bird survey and bat acoustic studies in accordance with the United States Fish and Wildlife draft wind turbine guidelines, tiers one through three recommended assessments." Again, I must reiterate that repetition of an erroneous statement does not make the statement any less inaccurate. As clearly outlined in my testimony, the CWRA Terrestrial Habitat Assessment does not meet the objectives of the Site Characterization (Tier Two) of the USFWS Guidelines. Furthermore, the acoustic monitoring protocol does not meet Field Studies criteria (Tier Three) which specifically calls for a complete year of acoustic monitoring, "recommends placing acoustic detectors on existing met towers" with detectors "placed at high positions" and "near the rotor swept zone." (USFWS, 2010: pg 37). Lastly, the USFWS Guidelines state that if *additional* monitoring is appropriate (above and beyond met tower sampling), ground monitoring

should be done with mobile sampling units, not stationary ones, to increase total coverage area. The sampling protocol designed by WEST at the CWRA fails in each of these respects, and therefore I am unable to determine how Mr. Tidhar believes the study was designed in accordance with this document.

Mr. Tidhar also suggests that BNE has minimized impacts to bat populations by not locating wind facilities "near high value bat habitat " nor will BNE locate "the turbines near permanent standing water". But Mr. Tidhar fails to realize the issue, as it pertains to bats, is not the destruction of these habitats as much as the presence of these habitats; standing water, particularly at high elevation sites such as the CWRA, attract bats and may be one of the most critical factors influencing foraging activity regionally (Lacki et al. 2007). Furthermore, Arnett et al. (2008), cited by BNE in their Petition and the interrogatory responses, clearly states that turbines near wetlands appear to have higher levels of bat mortality. Given that bat species have nightly movements that extend over miles, it is unclear how Mr. Tidhar can conclude that having a pond and forested wetland less than 300 feet away from a turbine is not 'near' potential bat activity.

Mr. Tidhar, in his testimony, indicates that a bat study will be conducted at Wind Colebrook North between April 15-October 31, 2011. While it is encouraging that site-specific bat data will be collected, the existing regulatory timeframe does not allow for these data to be considered and assimilated into the site planning process. Therefore, there can be no meaningful consideration of the impacts to bats prior to a decision be rendered by the Sighting Council.

Further, a bat survey conducted in the same fashion as BNE's bat survey at Wind Colebrook South, submitted as part of this petition, cannot adequately assess the potential impact of wind turbine development at Wind Colebrook North on bats. The survey design was

inherently flawed and inadequate in scope to address the range of documented adverse impacts on bats.

**Q14. Did you review the Final Report on bat acoustic activity submitted as Exhibit 2 of Mr. Tidhar's testimony?**

A14. Yes.

**Q15. Would you like to identify any concerns you have with the Final Report?**

A15. Yes. I have many concerns with the final report ('Report'), but the basic points are as outlined as follows:

a) the Report states that "Myotis bats in Connecticut generally have echolocation with minimum frequencies near 40 kilohertz (kHz), whereas species such as the eastern red bat (*Lasiurus borealis*) typically have echolocation calls that fall between 30 and 40 kHz..." (pg. 7). It is unclear what Connecticut-specific data were used to justify this statement, nor is it clear why WEST thinks that red bats in Connecticut typically call under 40 kHz, but red bats throughout the rest of the country "emit calls with minimum frequencies between 30 and 43 kHz (J. Szewczak, pers. comm.)" (pg. 8 of the Final Report). It is clear that this truncation is used as a *post facto* justification of the categorization of eastern red bats as MF bats (30 - 40 kHz) despite knowing that many calls have frequencies above 40 kHz. Although this may sound like a minor point, it is critical to realize that WEST is using a 40 kHz threshold to categorize MF and HF bats despite acknowledging that five of the eight potential bat species have minimum call frequencies that can be found within 2 kHz of their threshold value.

b) The Executive Summary of the Report states that bat activity was monitored at the CWRA project site from June 25 through November 01, 2010, for a total of 130 nights. Limiting the analysis to just the Anabat detectors (CA1 and CA2), the proposed sampling effort was then 260 detector-nights (2 detectors for 130 nights each). In the Results of the Report, WEST states that the CA2 sampling point malfunctioned and therefore can't be used as part of the activity index. Furthermore, the CA1 sampling point worked for a total of 102 nights, having a malfunction for almost a complete month (24 days) during the fall sampling period. WEST states that the CA1 recorded data during 80.3% of the sampling period, but doesn't address the sampling effort of the original study design. In the context of the original study, the recording rate of the Anabat systems was only 44.3% (102 out of the original 260 detector-nights). Adding the SM2Bat system to the overall sampling effort (successful on 30 of 43 detector nights), yields a combined 132 detector nights out of a proposed 303 detector-nights. This yields an overall recording rate of 43.6%, an extremely low sampling rate that is not made very explicit in the Report.

c) The Report continues to attempt to discriminate and interpret data on the hoary bat and eastern red bat despite acknowledging that their discrimination methods only isolated 9 total calls (out of a combined 3,817 calls from the MF and LF groups) and that Lasiurines have a high degree of variability in their echolocation call structures. Despite having only 9 calls, representing a mere 0.2% of the total MF and LF calls), WEST interprets eastern red bat and hoary bat activity in Tables 2 and 4 and Figures 7 and 10. WEST's attempt to interpret these data (4 calls from hoary bats and 5 calls from red bats) is statistical invalid.

d) The last major problem with the final report is that it is internally inconsistent. WEST claims that hoary bats and red bats represent only 0.2% of the total bat activity at the project site based on data they collected and analyzed using the Anabat system. They then claim, based on SM2Bat data, that hoary bats and red bats were detected on 23.3% and 16.7% of all sampling nights, respectively. Therefore, WEST is claiming that hoary bats were virtually undetected at the project site while at the same time arguing that hoary bats were one of the "three most commonly identified species" at the CRWA. This inconsistency is, in my opinion, the result of the arbitrary MF/HF species group that WEST created and poor discrimination of species within these groups.

#### **Literature Cited:**

- AGFD, 2008. Arizona Game and Fish Department, 2009. Guidelines for reducing impacts to wildlife from wind energy development in Arizona. released November 23, 2009.
- Arnett, E. et al., 2007. Patterns of pre-construction bat activity at a proposed wind facility in northwest Massachusetts. An annual report submitted to the Bats and Wind Energy Cooperative. Bat Conservation International. Austin, TX
- Arnett, E.B., W.K. Brown, W.P. Erickson, J.K. Fiedler, B.L. Hamilton, T. Henry, A. Jain, G. Johnson, J. Kerns, R. Koford, C. Nicholson, T. O'Connell, M.D. Piorkowski, and R.D. Tankersley, 2008. Patterns of bat fatalities at wind energy facilities in North America. *Journal of Wildlife Management*, 72: 61-78.
- Britzke, E.R. 2004. Designing monitoring programs using frequency-division bat detectors: active versus passive sampling. Pp. 79-83. In: R. Mark Brigham, et al. (eds.) *Bat Echolocation Research: tools, techniques, and analysis*. Bat Conservation International, Austin, TX.
- Jones, J. 2006. Methodologies for evaluating bird and bat interactions with wind turbines in Maine. Draft Report prepared by Maine Audubon, Maine Windpower Advisory Group, Maine DIFW, and Wildlife Windpower Siting Committee; April 2006, 27 pp.
- Kunz, T.H. et al. 2007. Ecological impacts of wind energy development on bats: questions, research needs and hypotheses. *Frontiers in Ecology and the Environment*, 5: 315-324.
- Lacki, M.J., et al. 2007. Foraging ecology of bats in forests. Pp. 83-127. In: M.J. Lacki, J.P. Hayes, and A. Kurta (eds). *Bats in Forests*. Johns Hopkins University Press, Baltimore, MD.

[NYDEC] New York Department of Environmental Conservation 2007. Guidelines for conducting bird and bat studies at commercial wind energy projects. Draft Report prepared by NYDEC, Dec 2007, 19 pp.

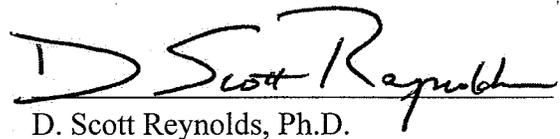
[PAGC] Pennsylvania Game Commission, 2007. Pre and Post-Construction Monitoring of Bat Populations at Industrial Wind Turbines Sites. Report released February, 2007.

USFWS, 2010. U.S. Fish and Wildlife Service Wind Turbine Guidelines Advisory Committee Recommended Guidelines. submitted to the Secretary of the Interior, March 04, 2010.

The statements above are true and accurate to the best of my knowledge.

27 April, 2011

Date

  
D. Scott Reynolds, Ph.D.

**CERTIFICATION**

I hereby certify that a copy of the foregoing document was delivered by first-class mail and e-mail to the following service list on the 28th day of April, 2011:

Carrie L. Larson  
Paul Corey  
Jeffery and Mary Stauffer  
Thomas D. McKeon  
David M. Cusick  
Richard T. Roznoy  
David R. Lawrence and Jeannie Lemelin  
Walter Zima and Brandy L. Grant  
Eva Villanova

and sent via e-mail only to:

John R. Morissette  
Christopher R. Bernard  
Joaquina Borges King

  
Denise L. Myron