Via Electronic Mail



February 13, 2023

Ms. Wendi Zheng Project Manager New York State Department of Environmental Conservation One Hunters Point Plaza 47-40 21st Street Long Island City, NY 11101

Re: Periodic Review Report and IC/EC Certification Submittal

Reporting Period: December 31, 2019 to December 31, 2022

Arthur Kill Correctional Facility Firing Ranges

2911 Arthur Kill Road, Staten Island, NY 10309-1101

Site No. 243039

Prepared for: Staten Island Stages LLC

203 Meserole Avenue Brooklyn, NY 11222

Dear Ms. Zheng:

Woodard & Curran has prepared this Periodic Review Report (PRR) and Institutional Control (IC) / Engineering Control (EC) Certification on behalf of Staten Island Stages, LLC for the Arthur Kill Correctional Facility Firing Ranges, Richmond County, Staten Island, New York (the Site). Pursuant to 6 NYCRR 375-1.2(at) and Chapter 6 of DER-10, this PRR documents activities undertaken to meet obligations set forth in the NYSDEC-approved Site Management Plan (SMP; C&S Engineers, Inc., August 2018) to ensure continued protectiveness of the remedy, and provides the IC/EC Certification forms as **Attachment A**.

#### 1.0 EXECUTIVE SUMMARY

The Site consists of two former firing ranges located on the former Arthur Kill Correctional Facility property in Staten Island, New York that were operated by the New York State Department of Corrections and Community Supervision (NYSDOCCS). The Old Firing Range was reputedly first used in 1979 by corrections officers and other agencies for the practice of pistol and shotgun marksmanship. The Old Firing Range remained in use until approximately 2005 when the New Firing Range was constructed immediately to the west. The Old Firing Range was abandoned at that time and the New Firing Range, which accommodated rifles as well as pistols and shotguns, was used from that time until the Arthur Kill Correctional Facility was closed in 2010.

Site assessments/investigations were conducted at the Site in 2004, 2006, 2012, and 2013. Lead was identified as the contaminant of concern. To address lead in the site soils in the firing ranges, Interim Remedial Measures (IRMs) were completed in 2014 and 2015. The IRMs for the Site consisted of clearing of vegetation in the remediation areas and excavation of soil to depths of six to 12 inches in the Old Firing Range and a small portion of the New Firing Range.



The Remedial Action Objectives (RAOs) for the Site are to: prevent ingestion of groundwater with contaminant levels exceeding drinking water standards; remove the source of ground or surface water contamination; and prevent ingestion/direct contact with contaminated soil. An Environmental Easement was executed and recorded for the property to restrict land and groundwater use. Detailed descriptions of the procedures required to manage Institutional Controls (ICs) and prevent exposure to remaining contamination at the Site, including periodic inspections, periodic assessments/evaluations, and submittal of PRRs, are detailed in the NYSDEC-approved SMP.

The SMP was finalized and issued to the NYSDEC in August 2018 and Site-wide inspections have been completed in general accordance with the SMP. Results of Site-wide inspections conducted during the reporting period on January 16, 2020, November 5, 2020, September 8, 2021, September 15, 2022, and November 14, 2022 indicate compliance with the provisions of the SMP and the remedy continues to perform as intended to meet the RAOs.

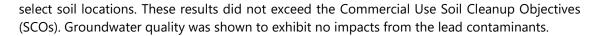
No areas of non-compliance with the major elements of the SMP were identified during the reporting period. There are no recommended changes to the SMP or to the frequency for submittal of Periodic Review Reports (PRRs).

During Site-wide inspections conducted during the reporting period, soil erosion was observed in a few locations on the insides of the two berms that run along the sides of the former new firing range. Staten Island Stages, LLC is currently assessing potential causes of the erosion and corrective measures to repair the existing erosion and reduce or eliminate future soil erosion.

#### 2.0 SITE OVERVIEW

The Site is situated on the former Arthur Kill Correctional Facility property located at 2911 Arthur Kill Road in Staten Island, New York. The Site is an approximately 1.84-acre area and is bounded by the Arthur Kill to the north, the remainder of the 81-acre Arthur Kill Correctional Facility to the south, wetlands to the east, and industrial parcels to the west (**see Figure 1 in Attachment B**). The properties immediately south of the facility include industrial and commercial properties with residential properties beyond the West Shore Expressway.

Site assessments/investigations were conducted at the Site in 2004, 2006, 2012, and 2013. Lead was identified as the contaminant of concern. To address lead in the site soils in the firing ranges, Interim Remedial Measures (IRMs) were completed in 2014 and 2015 in accordance with the NYSDEC-approved IRM/SC Work Plan. The IRMs for the Site consisted of clearing of vegetation in the remediation areas and excavation of soil to depths of six to 12 inches in the Old Firing Range and a small portion of the New Firing Range. No changes to the NYSDEC-approved IRM/SC Work Plan were made. Confirmatory sampling indicated that the IRMs were effective in remediating the Site's soils. Following the IRMs, a Site Characterization was completed in 2015 to determine if contamination remained at the Site following the IRM and, if present, to identify the nature and extent of that contamination. The Site Characterization consisted of the collection and analysis of surface soil samples, subsurface soil samples, and groundwater samples. The results of the Site Characterization demonstrated that the IRMs removed the vast majority of lead-impacted soils across the Site, although some slightly elevated concentrations were identified in a few locations. Additional analytes such as pesticides, semi-volatile organic compounds (SVOCs), and other metals were also detected at slightly elevated concentrations in





The Remedial Action Objectives (RAOs) for the Site are to: prevent ingestion of groundwater with contaminant levels exceeding drinking water standards; remove the source of ground or surface water contamination; and prevent ingestion/direct contact with contaminated soil. An Environmental Easement was executed and recorded for the Site to restrict land and groundwater use.

### 3.0 EVALUATION OF REMEDY PERFORMANCE, EFFECTIVENESS AND PROTECTIVENESS

In accordance with the SMP, site-wide inspections were conducted at a minimum of once per year to confirm that the institutional controls continue to perform as designed and continue to be protective of human health and the environment. For the reporting period of December 31, 2019 through December 31, 2022, site-wide inspections were conducted on January 16, 2020, November 5, 2020, September 8, 2021, September 15, 2022 and November 14, 2022.

There was one severe precipitation event (i.e., greater than 3 inches in a day) and no emergencies during the reporting period. The severe precipitation event occurred during Hurricane Ida, when there was approximately 8.41" of precipitation on September 2, 2021. In accordance with Section 34.3 of the SMP, a follow-up site-wide inspection occurred as part of the annual inspection on September 8, 2021. No adverse site conditions were observed.

Based on the results of the site-wide inspections, the cover system is intact and fully vegetated, protective of human health and the environment, and is performing as intended in the IRM/SC Work Plan.

During Site-wide inspections conducted during the reporting period, soil erosion was observed in a few locations on the insides of the two berms that run along the sides of the former new firing range. Staten Island Stages, LLC is currently assessing potential causes of the erosion and corrective measures to repair the existing erosion and reduce or eliminate future soil erosion.

#### 4.0 IC/EC PLAN COMPLIANCE REPORT

#### 4.1 Engineering Controls (ECs)

There were no engineering controls implemented as part of the NYSDEC-approved remedial program to achieve the remedial action objectives for the Site.

#### 4.2 Institutional Controls (ICs)

ICs for the Site consist of an Environmental Easement executed on May 3, 2018 and recorded with the New York City Office of the City Registrar on July 18, 2018 to prevent future exposure to remaining contamination at the Site and limit the use and development of the Site to commercial or industrial uses only. The ICs impose the following use restrictions:

- The property may be used for: commercial and industrial use;
- The use of groundwater underlying the property is prohibited without necessary water quality treatment as determined by the NYSDOH or the New York City Department of Health and Mental Hygiene to render it safe for use as drinking water or for industrial



purposes, and the user must first notify and obtain written approval to do so from the Department;

- Data and information pertinent to site management must be reported at the frequency and in a manner as defined in the SMP;
- All future activities that will disturb remaining contaminated material must be conducted in accordance with the SMP;
- Access to the site must be provided to agents, employees or other representatives of the State of New York with reasonable prior notice to the property owner to assure compliance with the restrictions identified by the Environmental Easement; and
- Vegetable gardens and farming on the site are prohibited.

Site-wide inspections are performed at a minimum of once per year to determine and document the following:

- Compliance with all ICs, including site usage;
- General site conditions at the time of the inspection;
- The site management activities being conducted including, where appropriate, confirmation sampling and a health and safety inspection;
- If these controls continue to be protective of human health and the environment;
- Compliance with requirements of the SMP and the Environmental Easement; and
- If site records are complete and up to date.

Site-wide inspections are also performed after all severe weather conditions or emergencies that may affect the remaining contamination at the Site. An inspection of the Site will be conducted within 5 days of the emergency event to verify the effectiveness of the ICs implemented at the Site by a qualified environmental professional, as determined by the NYSDEC. A severe weather event includes rain in excess of 3" in a calendar day. One severe weather event occurred on September 2, 2021 with a total of approximately 8.41" of rainfall. A follow-up site visit was conducted on September 8, 2021.

Observations from the Site-wide inspections are recorded on the inspection forms included in Appendix G of the SMP. The forms for the Site-wide inspections conducted during the reporting period from December 31, 2019 through December 31, 2022 are included in **Attachment C**.

No substantive changes have occurred or otherwise been made at the Site since remedial action was completed, and no changes have been made to the ICs. During the reporting period, the Site was used for commercial use only, groundwater was not used for any purpose, there was no requirement to report data and information pertinent to site management, no earth disturbance activities were conducted, notice to gain access to the Site was not provided by agents, employees or other representatives of the State of New York, and vegetable gardens and farming were not conducted at the Site. The annual Site-wide inspection conducted during the reporting period demonstrates that the ICs implemented continue to prevent exposure to remaining soil contamination, there are no substantial deficiencies in the ICs, and that corrective measures other than Site-wide annual inspections are not warranted at this time for the current Site use.



During Site-wide inspections conducted during the reporting period, soil erosion was observed in a few locations on the insides of the two berms that run along the sides of the former new firing range. Staten Island Stages, LLC is currently assessing potential causes of the erosion and corrective measures to repair the existing erosion and reduce or eliminate future soil erosion.

Completed IC/EC forms are provided in **Attachment A**.

#### 5.0 MONITORING PLAN COMPLIANCE REPORT

The SMP does not include a Monitoring Plan describing the measures for evaluating the performance and effectiveness of the remedy to mitigate contamination at the Site. Site-wide inspections are included as part of the Institutional Control Plan in the SMP and are discussed in **Section 4.2.** 

#### 6.0 OPERATION & MAINTENANCE (O&M) PLAN COMPLIANCE REPORT

The SMP does not include an Operation & Maintenance (O&M) Plan.

#### 7.0 OVERALL PRR CONCLUSIONS AND RECOMMENDATIONS

Based on the above findings, the ICs are deemed protective of human health and the environment and are performing as designed and provisions of the SMP are being met. The Remedial Action Objectives for the Site are being met and no substantial deficiencies in the ICs or in SMP requirements for evaluating remedy performance have been identified. No corrective measures or changes to either the remedy or SMP requirements are proposed.

The following activity is proposed for the next reporting period:

- Conduct Site-wide inspection(s) per the SMP.
- Complete assessment of potential causes of the soil erosion that was observed in a few locations on the insides of the two berms that run along the sides of the former new firing range and implement corrective measures to repair the existing erosion and reduce or eliminate future soil erosion along the berms.

If you have any questions concerning this Periodic Review Report or any other aspect of the project, please contact the undersigned, Gil Ryan at 203-699-6105 or <a href="mailto:gryan@woodardcurran.com">gryan@woodardcurran.com</a>. Thank you for your time and assistance.

Sincerely,

**WOODARD & CURRAN** 

Sullet S. Kyan

Gilbert S. Ryan, P.E. Sr. Project Manager

copy: G. Argento – Staten Island Stages, LLC

Attachments



### ATTACHMENT A: IC/EC CERTIFICATION FORMS



# Enclosure 2 NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION Site Management Periodic Review Report Notice Institutional and Engineering Controls Certification Form



Sit	e No.	243039	Site Details		Box 1	
Sit	e Name Ar	thur Kill Correctional F	acility Firing Ranges			
Cit <sub>y</sub>	e Address: y/Town: Staunty: Richme e Acreage:	ond	Zip Code: 10309-1101			
Re	porting Peri	od: December 31, 2019	to December 31, 2022			
					YES	NO
1.	Is the infor	mation above correct?			$\overline{\mathbb{X}}$	
	If NO, inclu	ude handwritten above or	on a separate sheet.			
2.		or all of the site property nendment during this Re	been sold, subdivided, mergorting Period?	ged, or undergone a		X
3.		been any change of use CRR 375-1.11(d))?	at the site during this Repor	ting Period		X
4.	Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?				X	
			s 2 thru 4, include docume viously submitted with th			
5.	Is the site	currently undergoing dev	elopment?			X
					Box 2	
					YES	NO
6.	Is the curre	ent site use consistent wi	th the use(s) listed below?		X	
7.	Are all ICs	in place and functioning	as designed?	×		
	IF T		QUESTION 6 OR 7 IS NO, 9 HE REST OF THIS FORM. O	•	ind	
AC	Corrective N	leasures Work Plan mus	t be submitted along with t	his form to address th	nese iss	ues.
 Sig	nature of Ov	vner, Remedial Party or D	esignated Representative	 Date		

SITE NO. 243039 Box 3

### **Description of Institutional Controls**

Parcel Owner Institutional Control

7187-1 Staten Island Stages, LLC

Ground Water Use Restriction Soil Management Plan Landuse Restriction Monitoring Plan

Site Management Plan

O&M Plan IC/EC Plan

The site remedy requires that an environmental easement be placed on the property to (1) prevent future exposure to remaining contamination by controlling disturbances of the subsurface contamination; and, (2) limit the use and development of the site to Commercial uses only. The environmental easement for the Site was executed by the Department on 3 May 2018 and was recorded with the New York City Office of the City Register on 18 July 2018. Identifier number for this filing is 2018000247549.

Site-wide inspections will be performed at a minimum of once per year. Site-wide inspections will also be performed after all severe weather conditions that may affect the remaining contamination at the site. A comprehensive site-wide inspection will be conducted and documented according to the SMP.

Box 4

### **Description of Engineering Controls**

None Required

Not Applicable/No EC's

Box	5
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	Periodic Review Report (PRR) Certification Statements		
1.	I certify by checking "YES" below that:		
	<ul> <li>a) the Periodic Review report and all attachments were prepared under the direct reviewed by, the party making the Engineering Control certification;</li> </ul>	ction of,	and
	<ul> <li>b) to the best of my knowledge and belief, the work and conclusions described in are in accordance with the requirements of the site remedial program, and general engineering practices; and the information presented is accurate and compete.</li> </ul>		
	engineering practices, and the information presented is accurate and compete.	YES	NO
		X	
2.	For each Engineering control listed in Box 4, I certify by checking "YES" below that all of following statements are true:	of the	
	(a) The Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Dep	artment	,
	(b) nothing has occurred that would impair the ability of such Control, to protect $\mathfrak p$ the environment;	oublic h	ealth and
	(c) access to the site will continue to be provided to the Department, to evaluate remedy, including access to evaluate the continued maintenance of this Control;	the	
	(d) nothing has occurred that would constitute a violation or failure to comply with Site Management Plan for this Control; and	n the	
	(e) if a financial assurance mechanism is required by the oversight document for mechanism remains valid and sufficient for its intended purpose established in the		
		YES	NO
		X	
	IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.		
	A Corrective Measures Work Plan must be submitted along with this form to address the	iese iss	ues.
	Signature of Owner, Remedial Party or Designated Representative Date		

### IC CERTIFICATIONS SITE NO. 243039

Box 6

### SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 1,2, and 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

Penal Law.	Woodard & Curran, Inc. 213 Court Street, 4th Floor,
Gilbert S. Ryan, P.E. at	
print name	print business address
am certifying asRemedial Party	(Owner or Remedial Party)
for the Site named in the Site Details Section	n of this form.
Signature of Owner, Remedial Party, or Des	



### **ATTACHMENT B: FIGURES**



SITE LAYOUT PERIODIC REVIEW REPORT DESIGNED BY: DRAWN BY: CHECKED BY: GR 0231811.01 U1.dwg

FIGURE 1

WOODARD &CURRAN

GR

213 Court Street, 4th Floor Middletown, Connecticut 06457 888.265.8969 | www.woodardcurran.com



### **ATTACHMENT C: INSPECTION REPORTS**

**NYSDEC SITE NUMBER: 243039** 

### SITE-WIDE INSPECTION FORM

Date	1/16/20		Inspector: Gil Ryan
Weather:	Cloudy;		Signature: Subut S. Kyan
Temperature:	40-45°F		Company: Wood and + Curran
	Year:	2020	

Item Inspected	Maintenance Needed (Y/N)	Comments
General Site Conditions	N	Looks good; no trash ldelins
Trees, bushes, other vegetation	$\mathcal{N}$	
Grass cover	$\mathcal{N}$	Grass, a Though brown, looks to have better covar than during previous

inspection on 4/24/19.

**NYSDEC SITE NUMBER: 243039** 

### **INSPECTION FORM**

Component	Item	Comments
Grass cover	Obvious subsidence, depressions or cracks—More Evidence of ponded water—None stressed or missing vegetation—grass is brown; soil erosion due to surface runoff—None vegetables or farming conducted—More Other:	
Site Records	Review of previous inspection reports Site records are up to date. Other:	Site-tuide inspection forms from previous inspection on 4/24/19 were reviewed.  Site records are up to date.
Site Usage	Site is compliant with site usage requirements in the Deed Resriction. There are no vegetable gardens or farming on Site. Other:	Only limited commercial activities eve conducted at the site. Site is comphant with a sage requirements in Environmental Easement.

Date:	1/16	120	Inspector:	Gillet S. Ryan
	1			

**NYSDEC SITE NUMBER: 243039** 

### SITE-WIDE INSPECTION FORM

Date	NOVEMBER 5, 2026	3100PM	Inspector: Gil Ryan
Weather:	Sunny		Signature: Gillet 5 Rayan
Temperature:	70°F		Company: Wood and + Curran
	Year:	2020	

Item Inspected	Maintenance Needed (Y/N)	Comments Looks good - w trash or debris in OLD Greyn - RANGE
General Site Conditions	Y	ONE SWALL ARGA NEEDS TO SHOULD  BE RAKED SMOOTHED OUT AND RESEEDED  SEE PHOTO AND SITE WAP.
Trees, bushes, other vegetation	N	no trees, bushes or other regetation in old ornew firing range areas, only grass.
Grass cover	Y	See Gereral Site Conditions. Grass cover in old firing range is mostly crab grass, which is mon brown dead.

Grass Ger in hew fining range area is good-very green,

5 awas on berns in new driving range

That need top soil and reseeding 3 other

aveas on these herms that just need

reseeding.

**NYSDEC SITE NUMBER: 243039** 

### **INSPECTION FORM**

Component	Item	Comments
Grass cover	Obvious subsidence, depressions or cracks—NONE Evidence of ponded water—NONE stressed or missing vegetation—Crab grass is brown soil erosion due to surface runoff—NONE vegetables or farming conducted—NONE Other:	in, due to time of your.
Site Records	Review of previous inspection reports Site records are up to date. Other:	Site-wide inspection forms from previous inspection on 1/16/20 were reviewed.  Site records are up-to-date.
Site Usage	Site is compliant with site usage requirements in the Deed Resriction. There are no vegetable gardens or farming on Site. Other:	Only limited commercial activities are conducted at The site. There are no vegetable gardens or farming on site. Site is compliant with site usage requirements in Deed 12 striction.

Date:	11/5/20	Inspector:	Gillet S. Ryan
	t l		

2911 Arthur Ell Bad, Staten Island, My

**NYSDEC SITE NUMBER: 243039** 

#### SITE-WIDE INSPECTION FORM

Date

9/8/21 11:30 AM

nspector: G Kyan

Weather:

Mostly Cloudy

Signature: <u>Gullert</u>

Temperature:

-90°C

Company: Windard + Curran

Year:

2021

Item Inspected	Maintenance Needed (Y/N)	Comments No trash or debris
General Site Conditions	$\mathcal{N}$	Grass covering is Thick in both the reward old firing range areas.
Trees, bushes, other vegetation	N	Locks good. No have spots in old firm
Grass cover	$\sim$	Grass renly mowed.

For Newarh Airport Weather Underground Site, There was 8.41 in the of vain on 9/2/21. Site personnel said There was no flooding at The site from Ida. I did not See any evidence of flooding at the site.

**NYSDEC SITE NUMBER: 243039** 

### **INSPECTION FORM**

Component	Item	Comments
Grass cover	Obvious subsidence, depressions or cracks—NON & Evidence of ponded water—NON & stressed or missing vegetation—Grass looks good (for soil erosion due to surface runoff—NON & vegetables or farming conducted—NON & Other:	ul
Site Records	Review of previous inspection reports Site records are up to date. Other:	Site-wide inspection forms from previous inspection on 11/5/20 were reviewed. Site records are up-to-date Limited commercial activities are
Site Usage	Site is compliant with site usage requirements in the Deed Resriction.  There are no vegetable gardens or farming on Site.  Other:	Limited commercial activities are conducted at The sites. There are no vegetable gardens or farming onsite.

Date:	9/8/21	Inspector:	Gillet S. Ryon
			/

2911 Athur Kill Road, Status Island, NY

**NYSDEC SITE NUMBER: 243039** 

### SITE-WIDE INSPECTION FORM

Date	9/15/22	11:15AM	Inspector:	Gil Plyan
Weather:	Sunny	_	Signature:	Gilbert S. Kyan
Temperature:	75°F	<del>.</del>	Company:	Woodad + Curan
	Year:	2022		

Item Inspected	Maintenance Needed (Y/N)	Comments
General Site Conditions	Ν	No trash ordebris. Grass covering is thick in both neward
Trees, bushes, other vegetation	N	Grass en inside of wethern of rew firing range is sparse in some areas due to grass fire earlier in The summer
Grass cover	N	and now firing varges looks good.

**NYSDEC SITE NUMBER: 243039** 

#### **INSPECTION FORM**

Component	Item	Comments
Grass cover	Obvious subsidence, depressions or cracks Evidence of ponded water—None stressed or missing vegetation—Grass looks good/f soil erosion due to surface runoff vegetables or farming conducted Other:	wside of west bern is missing a grass in areas due to grass in areas due to grass fire earlier in the summar. There is not erosion on the interior walls of each bern beneath the slanted concrete structures.
Site Records	Review of previous inspection reports — Yet Site records are up to date. — Yet Other:	From previous justice were reviewed.
Site Usage	Site is compliant with site usage requirements in the Deed Resriction.  There are no vegetable gardens or farming on Site.  Other:	Limited commercial activities are conducted at The Site. There are no regetable gardens or forming assite.

Date:

9/15/22

Inspector:

Gilbert S. Pycen

2911 ArTher KII Road, State , Island, My

NYSDEC SITE NUMBER: 243039

### SITE-WIDE INSPECTION FORM

Date	11/14/22	Inspector: Lauren Henril
Weather:	Clear	Signature: Kall Hell  Company: Woodord & Cliver
Temperature:	50°F	Company:
	Year:	2022

Item Inspected	Maintenance Needed (Y/N)	Comments
	N	is thick in no old conges
General Site Conditions		
Trees, bushes, other vegetation	N	Grows on inside of west born of nu Fry range is sperse in some are
Trees, pusites, other vegetation	N	Grass on Flot surfaces on new
Grass cover	1	

# 2911 Arthr Kill Road, Staten Island, MY ARTHUR KILL CORRECTIONAL FACILITY FIRING RANGES

## SITE MANAGEMENT PLAN

NYSDEC SITE NUMBER: 243039

### **INSPECTION FORM**

Component	Item	Comments
Grass cover	Obvious subsidence, depressions or cracks Evidence of ponded water - none stressed or missing vegetation - tracks soil erosion due to surface runoff vegetables or farming conducted Other:	inside of west bern is missing gress in great due to fire in summer wall of each on the interior wall of each bern beneath the stanted concrete structures.
Site Records	Review of previous inspection reports Site records are up to date. Yes Other:	siterade inspector forms from previous inspectors were reviewed
Site Usage	Site is compliant with site usage requirements in the Deed Resriction.  There are no vegetable gardens or farming on Site.  Other:	Umited commercial activities are conducted at the site. There are no vegetable grunds or farming onsite.
* .		

Date:

Inspector:



Photo 1: January 16, 2020 – New Firing Range Looking South



Photo 2: January 16, 2020 – Old Firing Range Looking Southeast



Photo 3: January 16, 2020 - Old Firing Range Looking Northwest



2

Photo 4: November 5, 2020 - Old Firing Range Looking East



Photo 5: September 8, 2021 – Old Firing Range Looking Southeast



Photo 6: September 15, 2022 – New Firing Range Looking South



Photo 7: September 15, 2022 - Old Firing Range Looking Southeast



Photo 8: November 14, 2022 - New Fire Range - Soil Erosion on Inside of Berm



Photo 9: November 14, 2022 - New Firing Range - Soil Erosion on Inside of Berm