BOARD OF WATER AND SOIL RESOURCES 520 LAFAYETTE ROAD NORTH LOWER-LEVEL BOARD ROOM ST. PAUL, MN 55155 WEDNESDAY, MAY 28, 2025

BOARD MEMBERS PRESENT:

Jayne Hager Dee, Jill Crafton, Joe Collins, LeRoy Ose, Mark Zabel, Mike Runk, Neil Peterson, Rich Sve, Ron Staples, Ted Winter, Todd Holman, Tom Schulz, Jason Garms, DNR; Katrina Kessler, MPCA; Steve Robertson, MDH; Thom Petersen, MDA

BOARD MEMBERS ABSENT:

Eunice Biel; Lori Cox; Joel Larson, University of Minnesota Extension

STAFF PRESENT:

John Jaschke, Rachel Mueller, Tom Gile, Travis Germundson, Adam Beilke, Rita Weaver, Karli Swenson, Jenny Gieseke, Les Lemm, Ken Powell, John Shea, Dave Weirens, Sara Reagan, Ryan Hughes, Marcey Westrick, Lucy Dahl

OTHERS PRESENT:

Jeff Berg, MDA; Sheila Vanney, MASWCD; LeAnn Buck, MASWCD; Alex Trunnell, MN Corn; Grahm Berg-Moberg, MN Townships; Dave Nathe, Michael Hennen, Don Arnosti, Duane Kroll

Chair Todd Holman called the meeting to order at 9:02 AM.

PLEDGE OF ALLEGIANCE

- **
 25-24
 ADOPTION OF AGENDA Moved by Joe Collins, seconded by Tom Schulz, to adopt the agenda as presented. *Motion passed on a roll call vote*.
- ** MINUTES OF APRIL 23, 2025 BOARD MEETING Moved by Jill Crafton, seconded by Jayne Hager Dee, to
 approve the minutes of April 23, 2025, as amended. *Motion passed on a roll call vote.*

PUBLIC ACCESS FORUM

Duane Kroll spoke about the ACUB Easement Alteration Request – Easement 49-01-12-04 Morrison County that's on the agenda today.

CONFLICT OF INTEREST DECLARATION

Chair Holman read the statement:

"A conflict of interest, whether actual, potential, or perceived, occurs when someone in a position of trust has competing professional or personal interests, and these competing interests make it difficult to fulfill professional duties impartially. At this time, members are requested to declare conflicts of interest they may have regarding today's business. Any member who declares an actual conflict of interest must not vote on that agenda item. All actual, potential, and perceived conflicts of interest will be announced to the board by members or staff before any vote."

REPORTS

Chair & Administrative Advisory Committee – Chair Todd Holman reported he attended the Tribal-State Relations Training with the Fond du Lac Band of Lake Superior Chippewa in May. Attended the Environmental Quality Board and stated they will be releasing the Carbon Calculator tool.

Executive Director's Report - John Jaschke reported on the legislature, stated there will be a special session. A federal funding update was given. Stated local government meetings are being scheduled regionally over the summer months. Minnesota Watersheds is having their tour in June in Northwestern Minnesota. The return to office directive from the Governor will be starting next week.

Jill Crafton asked what roles Jared House and Jennifer Hahn have. John stated Jared is the Soil Health Program Coordinator and Jennifer is the Federal Funding Coordinator.

Audit and Oversight Committee – Joe Collins reported the committee has not met.

Dispute Resolution and Compliance Report – Rich Sve reported they have not met. Travis Germundson reported there have been two new appeals filed since the last report.

File 25-6 is an appeal of WCA Restoration Order for a property located in Otter Tail County. The appeal regards the placement of fill in wetland for shoreline access. No decision has been made on the appeal.

File 25-5 is an appeal of a WCA notice of decision for a property in Waseca County. The appeal regards the denial of an exemption application for maintenance of a private ditch. The petition regards the eligibility of the agricultural activities exemption for wetland impacts from drainage maintenance on

areas labeled on valid certified wetland determination by the Natural Resources Conservation Service (NRCS). No decision has been made on the appeal.

File 25-4 is an appeal of a WCA notice of decision for a property in St. Louis County. The appeal has been denied.

File 24-9 is an appeal of a WCA notice of decision in Morrison County. The parties have mutually agreed to an extension until August 1st.

File 24-8 is an appeal of a WCA Restoration Order for a property located in Beltrami County. Travis was noticed that the individual is working with the EPA to restore the site and it should drop off the list by next month.

Travis stated as of April 1st McLeod County adopted a resolution withdrawing their election jurisdiction to enforce buffer law and will default back to the Board of Water and Soil Resources.

Grants Program & Policy Committee – Mark Zabel reported they met and have two decision items on the agenda for today. They received a status update on grant funding for the mid-term evaluation of One Watershed One Plan.

RIM Reserve Committee – Jayne Hager Dee reported they have three decision items on the agenda today and will have additional items in June.

Water Management & Strategic Planning Committee – Joe Collins reported they have not met. They previously discussed the Strategic Plan that will be presented today.

Wetland Conservation Committee - Jill Crafton reported they met in April.

Buffers, Soils & Drainage Committee – LeRoy Ose reported they have not met.

Drainage Work Group (DWG) – Neil Peterson reported they have not met and will be meeting June 18th. John Jaschke stated a survey was sent out requesting potential topics to be worked on over the next year.

AGENCY REPORTS

Minnesota Department of Agriculture – Thom Petersen reported they were pleased to have their legislative bill passed and provided an overview of what was included.

Joe Collins asked if there were any effects on weather stations with the federal cuts. Commissioner Petersen stated with the National Weather Service's cutbacks we could see more reliance on state weather stations.

Jayne Hager Dee asked what a wolf claim is. Commissioner Petersen stated its cattle or livestock loss due to wolf predation. Mark Zabel asked what the relation to that program is with the Animal and Plant Health Inspection Service (APHIS). Commissioner Petersen stated the APHIS Program is hard to prove and doesn't pay very much, most farmers use the state program.

Minnesota Department of Health – Steve Robertson reported they are waiting for their legislative bill to pass. The Drinking Water Action Plan has been delayed until after the legislative session. Stated EPA has rolled back some of the final PFAS National Water Quality Standards.

Minnesota Department of Natural Resources – Jason Garms reported their legislative bill is still being worked on. They are preparing for the return to office directive from the Governor. Jason provided a forest fire update, stated there are websites that track active fires.

Minnesota Extension – Joel Larson provided a report in the Day of Packet.

Minnesota Pollution Control Agency – Melissa Lewis reported the feedlot rules are being amended with public meetings taking place; the comment period is through July 22nd. The Climate Action Framework is being updated. The Climate Pollution Reduction Grant is moving forward. They are continuing to advocate for sustaining federal funds. Stated the 24-hour Nitrate Network, a Clean Water Fund Program from last year, had some of the initial sensors put in and are anticipating more installed this year. Results are available on their website.

ADVISORY COMMENTS

Association of Minnesota Counties – No report was provided.

Minnesota Association of Conservation District Employees - No report was provided.

Minnesota Association of Soil & Water Conservation Districts - No report was provided.

Minnesota Association of Townships – No report was provided.

Minnesota Watersheds - No report was provided.

Natural Resources Conservation Service – No report was provided.

COMMITTEE RECOMMENDATIONS

Grants Program and Policy Committee

Grant Noncompliance Policy Revision – Adam Beilke presented Grant Noncompliance Policy Revision.

BWSR grant recipients are responsible for managing State grant funds in compliance with statutes, rules, grant agreements, BWSR requirements, procedures, and other applicable laws and requirements. BWSR has developed the Grant Noncompliance Policy to categorize levels of noncompliance and establish procedures for addressing noncompliance issues. The Board first approved a Grant Noncompliance Policy on June 24, 2015. The most recent version of the policy was approved on June 26, 2019.

Recently, BWSR staff have been working to streamline the agency's delivery and structure of grant program requirements for FY2026. This work includes the elimination of individual grant program policies, defining program requirements within the grant agreement, and reformatting the Grants Administration Manual to better distinguish procedures from guidance.

BWSR staff have identified minor revisions to the Grant Noncompliance Policy that are necessary to reflect changes from the grants streamlining work as well as to provide additional clarification to noncompliance procedures and updated references to Office of Grants Management Policy 08-13.

Grants Program & Policy Committee reviewed the proposed changes on May 19, 2025, and recommend approval to the Board.

Jill Crafton commented that the tiers seem to have more flexibility.

** Moved by Rich Sve, seconded by Mike Runk, to approve the Grant Noncompliance Policy Revision.
 25-26 Motion passed on a roll call vote.

Funding Recommendations for the FY26 Water Quality and Storage Program Grants – Rita Weaver presented Funding Recommendations for the FY26 Water Quality and Storage Program Grants

The Water Quality and Storage Pilot Grant program was passed into law by the MN Legislature in 2021. The intent of the program is to fund projects that will reduce runoff volume or peak flow rates by implementing storage practices. This will be our fourth round of applications funded.

In January 2025, the Board adopted Board Order #25-03 which authorized staff to conduct a request for proposals for the FY26 Water Quality and Storage Program. An application period was open for approximately nine weeks.

Applications were scored and ranked by a team of BWSR staff, and the scoring team recommends that seven projects be funded. In addition to the seven projects that are recommended for funding, the scoring team would like to keep one of the projects eligible for funding in case funds become available due to design or cost changes as work plans are finalized.

While federal funds have been received to support this program, the agreements are not finalized with the NRCS at this time. Therefore, federal funds are not being used towards these projects. These projects can be counted towards our required match with the federal grant, however.

The staff recommendations were presented to the BWSR SMT May 13, 2025 and the Grants Program and Policy Committee on May 19, 2025. The funding recommendations included in the board order are a result of those meetings.

Mark Zabel stated in the committee meeting it was asked to find out if Le Sueur SWCD project would accept partial funding. Rita stated she reached out to Mike Schultz from Le Sueur County SWCD and Mike stated they would consider it but depends on the amount.

Jill Crafton asked for a little more sense of what these projects are hoping to accomplish. Rita reviewed what the projects are designed to accomplish.

** Moved by Mike Runk, seconded by Joe Collins, to approve the Funding Recommendations for the FY26
 25-27 Water Quality and Storage Program Grants. *Motion passed on a roll call vote*.

RIM Reserve Committee

RIM Easement Alteration Request for Blue Earth County Road Improvements - Easement #07-20-99-01 - Karli Swenson presented RIM Easement Alteration Request for Blue Earth County Road Improvements - Easement #07-20-99-01.

The Blue Earth County Highway Department is requesting release of 3.5 acres from RIM Easement 07-20-99-01 to accommodate relocation and reconstruction of CSAH 10, which currently runs adjacent to

the southern boundary of the RIM Easement. This is a 61.1-acre CREP easement, acquired in 2001, and the associated CRP contract that has since expired.

CSAH 10 has been deemed significantly deteriorated with poor sight distances, unsafe vertical and horizontal curves and narrow shoulders, all posing a risk to the public. The purpose of the project is to correct these deficiencies and design a new, safer roadway that meets current MNDOT State Aid standards.

The project will include shifting the location of the roadway further north, onto what is currently RIM easement land. The road will be widened to include 12' driving lanes, 8' shoulders with flatter and safer in-slopes, new drainage pipes under the road, and new pavement. The county has acquired 3.5 acres of the RIM easement lands from the current landowner, for placement of the newly constructed roadway and associated right-of-way.

RIM Statute MN Statute 103F.535, Subd. 5 says the Board can alter an easement only if the board determines that the public interest and general welfare are served by the alteration. The reconstruction of CSAH 10 will provide significant safety improvements to the traveling public and adjacent landowners by providing wider driving lanes, wider shoulders with flatter ditch slopes and softer curves to improve sight distances and reaction time, reducing crash rates, risk and severity, and providing a safer place for stalled vehicles and maintenance vehicles and equipment to stop.

BWSR's Easement Alteration Policy for public benefitted projects allows for release of land from the easement if the public entity compensates BWSR for the released acres at two times the current RIM payment rate, reimburses the State any funds paid for conservation practices, plus a \$500 administrative fee. Blue Earth County has submitted the \$500 fee and has agreed to pay BWSR \$68,390.92 for release of the 3.5 acres as calculated below.

A. Compensation for Easement Release:

Release area = 3.5 acres in Ceresco Township, Blue Earth County (2.6 acres cropland and 0.9 acres non-cropland)

- a. Current Cropland Rate: \$10,604/ac 2x Cropland Rate: \$21,208/ac x 2.6 acres = \$55,140.80
- b. Current Non-cropland Rate: \$7069/ac
 2x Non-Cropland Rate: \$14,138/ac x 0.9ac = \$12,724.20

Total compensation to release 3.5 acres = \$67,865.00

- B. Conservation Practice Reimbursement: (based on paid cost-share vouchers in easement file)
 - a. Practice Area 3: Release 0.5 ac RR8 (158.37/ac) = \$79.18
 - b. Practice Area 4: Release 1 ac RR8 (158.37/ac) and RR2FB (98.73/ac) = \$257.10
 - c. Practice Area 5: Release 1.6 ac RR2FB (98.73/ac) = \$157.97
 - d. Practice Area 9: existing watercourse no payment = \$0
 - e. Practice Area 10: Release 0.2 ac existing trees no payment = \$0
 - f. Practice Area16: Release 0.2 ac RR8 (158.37/ac) = \$31.67

Total Conservation Practice Reimbursement Payments for release area = \$525.92

Total Due upon BWSR Board Approval (A + B) = \$68,390.92

Recommendation

The RIM Reserve Committee recommends approval of this request to release 3.5 acres from RIM easement 07-20-99-01 as the project will have a significant public safety benefit and the County Highway Department has agreed to compensation according to the Easement Alteration Policy. The Blue Earth SWCD Board has also submitted a letter in support of the alteration request.

Jill Crafton asked about the removal of trees and if they were going to be planting any in their place. Karli stated they will be removing trees within the area acquired and BWSR will be reimbursed for those costs.

Commissioner Petersen asked what happens when money is paid back to BWSR. Sharon Doucette stated there are a couple different options depending on how old the money is, the goal is to reuse the funds for similar purposes.

Moved by LeRoy Ose, seconded by Jayne Hager Dee, to approve the RIM Easement Alteration Request
 for Blue Earth County Road Improvements - Easement #07-20-99-01. *Motion passed on a roll call vote.*

RIM Easement Alteration Request – Easement 21-18-01-01-C Douglas County – Nathe – Karli Swenson presented RIM Easement Alteration Request – Easement 21-18-01-01-C Douglas County – Nathe.

BWSR acquired easement 21-18-01-01 on June 14, 2002 as part of the CREP easement program. The original easement is 136.1 acres consisting of restored wetlands, native grass, forb and tree plantings. The easement area has since been split and sold to 4 different landowners. Mr. Nathe, who submitted this request, purchased a parcel containing 27.2 RIM easement acres in December of 2019, now known as 21-18-01-01-C.

There are 9 acres in the southeast corner of Mr. Nathe's parcel that were excluded from the original RIM easement. This area consists of existing wetlands, and approximately 1 acre of tillable upland where Mr. Nathe currently maintains a food plot and has constructed a shed for personal use. However, there was no access route left out of the easement for the landowner to access the excluded area, which has inturn become landlocked by the RIM easement. This requires the landowner to drive through the easement area to access his shed and food plot on the excluded land.

Mr. Nathe is requesting to release a 1.5-acre piece of the easement area, adjacent to the township road, to move the exclusion and his shed for easier access. He is offering to add the remaining 9 acres of the parcel to the RIM easement in exchange. This would be a 6:1 replacement ratio that exceeds BWSR's policy requirements.

Mr. Nathe has agreed to discontinue his food plot and would restore the upland areas being added to the easement, at his own cost, to trees and shrubs that would benefit pollinators. Moving the exclusion would also eliminate further disturbance to the easement (and non-easement) area from repeated vehicular access to the shed and food plot and would result in a net gain to the easement of 7.5 acres, providing permanent protection on the remainder of the parcel.

Since purchasing this land, Mr. Nathe has been very active in managing and improving vegetation on the site, by utilizing controlled burning to reduce smooth brome grass cover and invigorate native grasses and forbs. He has re-seeded over 3 acres to enhance and improve biodiversity and has replanted trees in areas where prior tree plantings have failed. Much of the enhancement work has been done at his own cost. Mr. Nathe has been an exceptional steward of the easement lands which he hopes to one day pass on to his children.

Mr. Nathe has submitted the \$500 processing fee for BWSR to consider his request and the Douglas SWCD and DNR Area Wildlife Supervisor have signed a letter in support of this request.

Recommendation

The RIM Reserve Committee recommends approval of this easement alteration request and believe that the public interest is better served by the alteration by adding a net 7.5 acres to the easement and eliminating disturbance to the existing easement area to access the landlocked exclusion. The request meets or exceeds all requirements of the Easement Alteration Policy.

** Moved by Ron Staples, seconded by Jill Crafton, to approve the RIM Easement Alteration Request –
 ²⁵⁻²⁹ Easement 21-18-01-01-C Douglas County – Nathe. *Motion passed on a roll call vote.*

ACUB Easement Alteration Request – Easement 49-01-12-04 Morrison County - Kroll – Karli Swenson presented ACUB Easement Alteration Request – Easement 49-01-12-04 Morrison County – Kroll.

BWSR acquired easement 49-01-12-04 in Morrison County on March 30, 2012 as part of the Army Compatible Use Buffer (ACUB) program, in partnership with the National Guard Bureau and Camp Ripley. The original easement is 29.4 acres, currently in row crop agriculture, which is an allowed use on federally funded ACUB easements. The current landowner of this parcel, Mr. Kroll, purchased the parcel containing the ACUB easement in January of 2016.

Mr. Kroll is requesting the release of 0.5 acre from the ACUB easement, to enter into a long-term lease with a third party who would like to construct a 5G cellular communications tower on land currently under easement. The landowner would also like to use the proposed tower to host a GPS transmitter that could be used in conjunction with tractor auto-steering equipment. He is offering to add 1.5 acres of the easement in exchange. Mr. Kroll has submitted the \$500 processing fee for BWSR to consider his request.

The purpose of the ACUB program in Minnesota is specifically to preserve open space and to minimize residential, industrial and commercial development within a priority buffer area around Camp Ripley. BWSR acquires easements, through an agreement with the National Guard Bureau, to limit any development or use of the property that would be incompatible with the mission of the installation at Camp Ripley, while preserving open space and habitat within the priority area.

BWSR staff contacted partners at Camp Ripley for input on whether such a change to the easement would present a land use conflict with military operations at Camp Ripley and therefore contradict the purpose of the easement program. The initial response from the Camp Ripley Airfield Manager was that they are in "absolute opposition" to a cell tower in this area. The proposed location falls within their Class D airspace. According to the airfield manager, a tower can be a vertical hazard for aircraft, and with the military training at lower altitudes, it is important to keep the airspace free of towers or hazards.

According to staff at Camp Ripley, even if BWSR were to approve the easement alteration request, a proposed communications tower would need FAA review and clearance. Camp Ripley staff have stated that they would express their opposition to the tower and the hazard it could present to the Army during FAA review.

The ACUB easement language states that: "*if Grantee (BWSR) fails to carry out its duties under this Easement, the United States shall have the same rights as the Grantee. Should Grantee, its successors or assigns allow the Property to be used for a purpose inconsistent with this Easement, its terms and conditions and in a manner inconsistent with the mission of Camp Ripley, the Secretary of the Army, through an authorized official, shall, at his discretion, in accordance with the requirements of 10 U.S.C.*

2684a(d)(4) have the right to demand the transfer of this easement to the United States, or a third party nonprofit corporation organized and existing under the laws of Minnesota."

This means that if BWSR fails to enforce the ACUB easement or were to allow any use of the property that would be inconsistent with Camp Ripley operations, the easement rights could be transferred to the United States, or a Minnesota non-profit corporation. If BWSR were to approve this request, military approval of the easement boundary alteration and tower construction would be required for BWSR to amend the easement and for the landowner to complete the proposed action.

Recommendation

The RIM Reserve Committee recommended denial of this easement alteration request. The proposed land use would be inconsistent with military operations at Camp Ripley and therefore the purpose of the ACUB program. If BWSR were to allow this land use, it could be viewed as a failure of the State to carry out its duties under the ACUB partnership and the easement rights could be transferred to the United States or a third party.

Joe Collins asked Karli to reaffirm that if we were to allow this, the army would take the easement back. Karli stated that the language states if BWSR fails to enforce this easement or allows the use of the land that conflicts with operations at Camp Ripley, the Secretary of the Army could request to transfer the easement rights to the United States of America.

Commissioner Petersen asked if there is an existing cell tower. Mr. Kroll stated there is an existing tower and wouldn't be any taller than the other one. Chair Holman stated this is a time for staff and members to speak. Commissioner Petersen asked why the military opposes a new tower. Karli stated that Camp Ripley reported any construction of a tower within Camp Ripley airspace would need to undergo review of the FAA. The FAA would then consider Camp Ripley's staff input on this project as part of their review. Camp Ripley staff have stated they would express their opposition to this tower being built on an ACUB easement. Jason Garms reported his understanding from their conversations in committee is the new tower would not be taller but would be more substantial.

Commissioner Sve stated the agreement language is very explicit and doesn't see another option other than to go with the recommendation and deny this request. Commissioner Sve thanked Mr. Kroll for coming today and for his comments.

LeRoy Ose stated if Mr. Kroll came to the board with permission from Camp Ripley and the FAA, he wouldn't see a reason why they couldn't approve the exchange.

Jayne Hager Dee stated if the military says no because it's in airspace and the FAA historically has followed their lead, that doesn't give the board a choice and it should be denied.

Joe Collins stated that the army and the FAA know what they're talking about for safety reasons.

** Moved by Jayne Hager Dee, seconded by Tom Schulz, to approve the denial the ACUB Easement
 ²⁵⁻³⁰ Alteration Request – Easement 49-01-12-04 Morrison County - Kroll. Motion passed on a roll call vote.

Chair Holman called a recess at 10:26 a.m. and called the meeting back to order at 10:37 a.m.

Water Management and Strategic Planning Committee

Update on BWSR's Strategic Plan – Jenny Gieseke presented Update on BWSR's Strategic Plan.

In 2024 the BWSR Board approved a new strategic plan for the agency. Jenny Gieseke provided an update to the Water Management and Strategic Planning Committee in March on the status of the plan, and shared that information with the full Board, along with plans for monitoring and evaluation moving forward.

Jill Crafton asked what it means when its states BWSR conservation efforts. Jenny stated it means that it ensures broad support for local led conservation, building local capacity and ensuring full support for BWSR program services in operations.

Joe Collins stated there are considerable conservation efforts that are locally led.

LeAnn Buck asked if there was anything in the plan that reflects technology or data management showing outcomes. LeAnn also asked how it's going to be communicated to the counties, watershed districts and soil and water conservation districts. Jenny stated the Strategic Plan is intended as a document that guides our work internally. Stated they could share it more broadly if it would be beneficial. Jenny highlighted the action item in the plan to use data.

Mark Zabel left the meeting at 11:16 a.m.

Wetland Conservation Committee

Wetland Conservation Act Rulemaking Update – Les Lemm and Ken Powell presented Wetland Conservation Act Rulemaking Update.

The Minnesota Board of Water and Soil Resources (BWSR) is responsible for promulgation of the Wetland Conservation Act (WCA) Rules (MN Rules Chapter 8420). The current WCA Rule was adopted in 2009, and multiple statute changes have occurred since adoption. Staff have been working on rule-related topics for several years, coordinating with other agencies and obtaining technical and policy input. Most recently, two preliminary drafts of the rule (dated November 12, 2014 and April 25, 2025) were posted on the BWSR website for the purpose of obtaining public input. The BWSR Wetland Conservation Committee has met several times to review rule topics and the preliminary draft rule language. The preliminary draft rules, comments received, and additional information is available on the WCA Rulemaking page of the BWSR website. The next step is to consider any additional feedback received and develop a final draft of the rule for consideration by the Wetland Conservation Committee and the full Board. After board adoption of a final draft rule, it will be posted in the State Register followed by additional opportunities for public review and input under the State Administrative Procedure Act. The purpose of this agenda item is to update the Board on the draft rule development process and provide an overview of the substantive changes currently contained in the preliminary draft rule.

Jill Crafton thanked Les and the team for their work.

LeRoy Ose asked if anyone develops wetlands and then sells them. Les stated that's typically referred to as Wetland Banking.

John Jaschke noted Snapshot articles are in the Day of Packet.

UPCOMING MEETINGS

- Central Region Committee is scheduled for 2:30 PM, June 2, 2025, in St. Paul and by MS Teams.
- RIM Reserve Committee is scheduled for 10:00 AM, June 9, 2025, in St. Paul and by MS Teams.
- Next BWSR Meeting is scheduled for 9:00 AM, June 25, 2025, in St. Paul and by MS Teams.

Chair Holman adjourned the meeting at 11:43 AM.

Respectfully submitted,

Rich Sve Vice Chair