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Riley Purgatory Bluff Creek Watershed District Permit Application Review

Permit No: 2022-002 Considered at Board of Managers Meeting: April 6, 2022 Received complete: March 17, 2022 Applicant: Minnetonka Public Schools, Paul Bourgeois, Representative: VAA Engineering, Andrew LaPalme, PE Minnetonka High School New Vantage/Momentum Building - The project proposes the Project: redevelopment of an existing parcel into a new building with associated parking, utilities, and landscaping. The project includes an underground stormwater infiltration system to provide volume control, water quality, and rate control. There is an existing stormwater pond on the parcel that will remain on site after redevelopment. Location: 5735 County Rd 101, Minnetonka, Minnesota 55345 Leslie DellAngelo, PE; and Scott Sobiech, PE; Barr Engineering Co. **Reviewer:**

Proposed Board Action

Manager ______ moved and Manager ______ seconded adoption of the following resolutions based on the permit report that follows and the presentation of the matter at the April 6, 2022 meeting of the managers:

Resolved that the application for Permit 2022-002 is approved, subject to the conditions and stipulations set forth in the Recommendations section of the attached report;

Resolved that on determination by the RPBCWD administrator that the conditions of approval of the permit have been affirmatively resolved, the RPBCWD president or administrator is authorized and directed to sign and deliver Permit 2022-002 to the applicant on behalf of RPBCWD.

Upon vote, the resolutions were adopted, _____ [VOTE TALLY].

Applicable Rule Conformance Summary

Rule		lssue	Conforms to RBPCWD Rules?	Comments	
В	Alterations		Yes		
С			See comment.	See rule-specific permit condition C1 related to name of individual responsible for on-site erosion control.	
J	Stormwater	Rate	Yes		
	Management	Management	Volume	See Comment	See stipulation 4 related to verifying the infiltration capacity of the soils and that the volume control capacity is calculated using the measured infiltration rate
		Water Quality	Yes		
		Low Floor Elev.	Yes		
		Maintenance	See Comment	See rule-specific permit condition J1 related to revisions to the draft agreement (language and exhibit).	
		Chloride Management	Yes		
		Wetland Protection	Yes		
L	Permit Fee Dep	oosit	NA	Governmental entity	
М	Financial Assur	ance	NA	Governmental entity	

Background

Minnetonka Public Schools proposes construction of a new building with associated parking, utilities, and landscaping. The project includes an underground stormwater infiltration system to provide volume control, water quality, and rate control. There is an existing stormwater pond on the parcel that will remain on site after redevelopment. Because the property owner has undertaken two prior redevelopment projects triggering the RPBCWD stormwater requirements since January 1, 2015 (i.e., when RPBCWD reinstituted a regulatory program) on the adjacent parcels under common ownership to the north, the presently proposed redevelopment will be considered in aggregate with prior changes under the common scheme of development provision of Rule J.

While there are no on-site or adjacent Wetland Conservation Act (WCA) protected wetlands for which wetland buffers would be required, the treated runoff leaving the site from the underground infiltration system is conveyed via storm sewer directly to an off-site protected wetland.

Two other permits have previously been issued for work at the Minnetonka School district property. Relevant project site information is provided below.

Project site information

Site Information	Permit 2015- 005 ¹	Permit 2017-063	Permit 2022- 002 (Current)	Site Aggregate Total (Includes Three Projects)
Total Site Area ³ (acres)	15.29	15.29	18.14 ²	18.14 ²
Existing Site Impervious Area				
(acres)	6.43	6.43	6.82	6.82
New (increase) in Site				
Impervious Area (acres)	0.3	0.19	0.76	1.25
Percent Increase in				
Impervious Surface	4.6	3.0	11.1	18.3 ⁴
Disturbed Site Impervious				
Area (acres)	0.96	0.13	0.39	1.48
Percent Disturbance of				
Existing Impervious Surface	14.9	2.0	5.7	21.7 ⁴
Total Disturbed Area (acres)	1.31	0.35	1.48	3.14

¹Permit 2015-005 was for work on Highway 101, city of Minnetonka street and on school district property. The information presented in the table only represents work on school district property.

²School district has acquired an adjacent parcel, adding 2.85 acres and 0.39 acres of existing imperviousness to the site ³Minnetonka School property now consists of four adjacent parcels under common or related ownership.

«Calculated based on pre-2015 project existing conditions (Common Scheme of Development Rule J, Subsection 2.5)

The following materials were reviewed in support of the permit request:

- 1. Permit application received on January 20, 2021 (Incomplete notice was sent on January 26, 2022; materials submitted to complete application on February 11, 2022)
- 2. New Vantage/Momentum Building Project Plan Set (15 sheets) dated January 19, 2022 (revised February 11, 2022, February 22, 2022, and March 16, 2022)
- 3. New Vantage/Momentum Building SWPPP dated January 20, 2022
- 4. New Vantage/Momentum Building Stormwater Report dated January 20, 2022 (revised February 11, 2022, February 22, 2022, and March 16, 2022)
- 5. Existing and Proposed HydroCAD models received January 20, 2022 (revised February 11, 2022, February 22, 2022, and March 16, 2022)
- 6. Geotechnical Report from Braun Intertec dated February 25, 2022
- 7. Draft Maintenance Agreement
- 8. Responses to review comments dated February 11, 2022
- 9. Responses to review comments submitted February 22, 2022
- 10. Responses to review comments submitted March 17, 2022.
- 11. Existing and Proposed P8 models (revised March 16, 2022)
- 12. Email from WSB Engineer, Earth Evans, who was the design of the existing storm pond on the site.
- 13. MnRAM for downstream wetland dated March 8, 2022.

Rule Specific Permit Conditions

Rule B: Floodplain Management and Drainage Alterations

Because the project will involve land-disturbing activities (placement of stormsewer inlets, flared end section, and riprap aprons) below the 100-year flood elevation of the existing storm water pond on the site, the project must conform to the requirements established in Rule B.

The proposed new structure must conform with low floor elevation requirements set forth by Rule B, Subsection 3.1, which states that it must be constructed in accordance with Rule J, subsection 3.6. Because the proposed new structure is in conformance with Rule J, Subsection 3.6a, as explained in later in this report, the new structure is also in conformance with Rule B, Subsection 3.1.

The project proposes to install two new stormsewer outlet pipes discharging runoff into the existing storm water pond on the site. The two outfalls will have flared-end-section (FES) end treatments and riprap aprons installed below the 100-year flood elevation of pond to prevent erosion. Because the construction plans show the existing and proposed grades match for the pipe and FES installation and riprap installation for the aprons will be below existing grade, the engineer concurs that the proposed project will not result in loss of flood storage below the 100-year flood elevation and the project conforms to Rule B, Subsection 3.2.

The engineer concurs with the applicant-provided runoff modeling results that demonstrate the proposed project will decrease the flow rates leaving the site relative to existing conditions (see the rate control analysis in Rule J below). Because the proposed flow rates leaving the site will be lower than existing flow rates the project is not reasonably likely to adversely impact off-site flood risk or channel stability. The applicant also provided pre- and post-project water quality modeling to demonstrate no adverse impact to water quality. The modeling results show the total suspended solids and total phosphorus load leaving the site after the project will be less than the existing load leaving the site. This also supports the engineer's determination that the project meets the requirements of Rule B, subsection 3.3. Because no watercourses exist on the site, the creekside restriction requirements set forth by Rule B, Subsection 3.4 do not impose requirements on the project. As detailed in the Rule C analysis below, the submitted erosion control plan conforms with Rule B, Subsection 3.5. A note on the plans indicates that activities must be conducted to minimize the potential transfer of aquatic invasive species conforming to Rule B, Subsection 3.6.

The proposed project conforms to the floodplain management and drainage alteration requirements of Rule B

Rule C: Erosion Prevention and Sediment Control

Because the project will involve 1.48 acres of land-disturbing activities, the project must conform to the erosion prevention and sediment control requirements established in Rule C.

The erosion control plan prepared by VAA Engineering. includes installation of perimeter control (silt fence), a stabilized rock construction entrance, inlet protection, daily inspection, placement of a minimum of 6 inches of topsoil (at 5% organic matter), decompaction of areas compacted during construction, and retention of native topsoil onsite to the greatest extent possible. To conform to RPBCWD Rule C requirements, the following revisions are needed:

C1. The Applicant must provide the name, address and phone number of the individual who will remain liable to the District for performance under this rule and maintenance of erosion and sediment-control measures from the time the permitted activities commence until vegetative cover is established.

Rule J: Stormwater Management

Because the project will involve 1.48 acres of land-disturbing activity (i.e., more than 5,000 square feet), the project must meet the criteria of RPBCWD's Stormwater Management rule (Rule J). Under paragraph 2.5 of Rule J, Common Scheme of Development, activities subject to Rule J on a parcel or adjacent parcels under common or related ownership will be considered in the aggregate, and the requirements applicable to the activity under this rule will be determined with respect to all redevelopment that has occurred on the site and on adjacent sites under common or related ownership since the date this rule took effect (January 1, 2015). Because two projects have been permitted since the rules took effect (RPBCWD Permit 2015-005 and 2017-063), the current activities proposed must be considered in aggregate with the activities proposed under the prior applications.

The criteria listed in Subsection 3.1 only apply to the disturbed areas on the project site because the project, when considered in aggregate with the other permitted activities at the site, increases the imperviousness by 18.3 percent and disturbs a combined 21.7 percent of the existing impervious surface on the site (Rule J, Subsection 2.3) (see project site information table above). The aggregate extent of disturbance is less than 50 percent of the impervious area of the site, and the three projects, in aggregate, expand the impervious area of the site by less than 50 percent, therefore RPBCWD's stormwater management requirements apply only to the increased and disturbed and reconstructed impervious areas of the site proposed for this project.

The applicant is proposing construction of an underground infiltration system to provide the rate control, volume abstraction and water quality management. Pretreatment for runoff entering the underground infiltration system is being provided by a manhole with sump and an isolator row in the underground system.

Rate Control

In order to meet the rate control criteria listed in Subsection 3.1.a, the 2-, 10-, and 100-year post development peak runoff rates must be equal to or less than the existing discharge rates at all locations where stormwater leaves the site. The applicant used a HydroCAD hydrologic model to simulate runoff rates for pre- and post-development conditions for the 2-, 10-, and 100-year frequency storm events using a nested rainfall distribution, and a 100-year frequency, 10-day snowmelt event. The existing and proposed 2-, 10-, and 100-year frequency discharges from the site are summarized in the below table. The proposed project is in conformance with RPBCWD Rule J, Subsection 3.1.a.

Modeled Discharge Location	2-Year Discharge (cfs)		10-Year Discharge (cfs)		100-Year Discharge (cfs)		10-Day Snowmelt (cfs)	
	Ex	Prop	Ex	Prop	Ex	Prop	Ex	Prop
Storm Main on Covington Road (South/East)	1.4	1.1	2.0	2.0	8.3	7.2	0.4	0.4
Storm Main on County Road 101	1.6	0.9	3.2	1.9	6.5	4.0	0.2	0.1
Existing Stormwater Pond	0.4	0.4	2.0	1.7	5.5	5.3	0.3	0.3

Existing and Proposed Peak Runoff Rates

Volume Abstraction

Subsection 3.1.b of Rule J requires the abstraction onsite of 1.1 inches of runoff from the regulated impervious surface of the site. An abstraction volume of 4,592 cubic feet is required from the 1.15 acres of regulated impervious area. Pretreatment for runoff entering the underground infiltration system is being provided by a manhole with sump and an isolator row in the underground system to conform to Rule J, Subsection 3.1.b.1.

The three soil borings (ST-14, ST-15, and ST-21) performed by Braun Intertec under the proposed underground infiltration system show that soils in the project area are primarily clayey sand and sandy lean clay. The Engineer concurs that the presence of clay soils, the observed normal water level in the existing stormwater pond, the city's tree preservation ordinance, and steep slopes present on the site show that the abstraction standard in Subsection 3.1 of Rule J cannot practicably be met, the site is considered a restricted site and stormwater runoff volume must be managed in accordance with Subsection 3.3 of Rule J.

For restricted sites, subsection 3.3 of Rule J requires rate control in accordance with subsection 3.1.a and that abstraction and water-quality protection be provided in accordance with the following sequence: (a) Abstraction of 0.55 inches of runoff from site impervious surface determined in accordance with paragraphs 2.3, 3.1 or 3.2, as applicable, and treatment of all runoff to the standard in paragraph 3.1c; or (b) Abstraction of runoff onsite to the maximum extent practicable and treatment of all runoff to the standard in paragraph 3.1c; or (c) Off-site abstraction and treatment in the watershed to the standards in paragraph 3.1b and 3.1c. The engineer concurs that the 2,679 cubic feet of abstraction provided by the applicant's proposed underground infiltration system is in accordance with subsection 3.3.a.

Groundwater was not observed at the soil borings under the proposed underground infiltration system. The subsurface investigation information summarized below shows that groundwater is at least 3 feet below the bottom of the proposed underground infiltration system (Rule J, Subsection 3.1.b.2.a).

Proposed BMP	Nearest Subsurface Investigation	Boring is within footprint?	Groundwater Elevation (feet)	BMP Bottom Elevation (feet)	Separation (feet)
Underground Infiltration System	ST-21	Yes	No groundwater observed at boring bottom (approx. el 915.8)	926.4	10.6

Groundwater Separation Analysis

The engineer concurs with the applicant's design infiltration rates of 0.06 inches per hour for clayey sand and sandy lean clay based on the guidelines provided in the Mn Stormwater Manual. Based on the design infiltration rate, the engineer concurs that the underground infiltration system will draw down within 48 hours (Rule J, subsection 3.1b.3). Per Rule J, Subsection 3.1.b.2.c measured infiltration capacity of the soils at the bottom of the infiltration systems must be provided. However, the applicant has chosen to wait until construction to conduct infiltration testing. The applicant must submit documentation verifying the infiltration capacity of the soils and that the volume control capacity is calculated using the measured infiltration rate. If infiltration capacity is less than needed to conform with the volume abstraction requirement in subsection 3.3a or there is inadequate separation to groundwater, design modifications to achieve compliance with RPBCWD requirements will need to be submitted (in the form of an application for a permit modification or new permit).

The table below summarizes the volume abstraction for the site based on the design infiltration capacity of the underground infiltration system. With the conditions noted above regarding verification of subsurface conditions, the engineer concurs with the submitted information and finds that the proposed project will conform with Rule J, Subsection 3.3.a.

Required Abstraction Depth (inches)	Required Abstraction Volume (cubic feet)	Provided Abstraction Depth (inches)	Provided Abstraction Volume (cubic feet)				
0.55	2,296	0.64	2,679				

Volume Abstraction Summary

Water Quality Management

Subsection 3.1.c of Rule J requires the Applicant provide for at least 60 percent annual removal efficiency for total phosphorus (TP), and at least 90 percent annual removal efficiency for total suspended solids (TSS) from site runoff, and no net increase in TSS or TP loading leaving the site from existing conditions. The Applicant is proposing to use an underground infiltration system and the existing stormwater pond to achieve the required TP and TSS removals and submitted a P8 model to estimate the TP and TSS removals. The results of this modeling are summarized in tables below showing the annual TSS and TP removal requirements are achieved. The modeling also indicates and that there is no net increase in TSS and TP leaving the site. The Engineer concurs with the modeling and finds that the proposed project to be in conformance with Rule J, Subsection 3.1.c.

Annual TSS and	I TP removal summary

Pollutant of Interest	Regulated Site Loading (lbs/yr)	Required Load Removal (lbs/yr)	Provided Load Reduction (lbs/yr)	
Total Suspended Solids (TSS)	1,423	1,280 (90%)	1,302 (91.5%)	
Total Phosphorus (TP)	4.6	2.8 (60%)	3.4 (73.6%)	

Summary of net change in TSS and TP leaving the site

Pollutant of Interest	Existing Site Loading (lbs/yr)	Proposed Site Load after Treatment (lbs/yr)	Change (Ibs/yr)
Total Suspended Solids (TSS)	149.6	120.4	-29.2
Total Phosphorus (TP)	1.3	1.1	-0.2

Low floor Elevation

All new buildings must be constructed such that the lowest floor is at least two feet above the 100-year high-water elevation or one foot above the emergency overflow of a stormwater-management facility according to Rule J, Subsection 3.6a. The applicant is proposing to construct the building with a low floor elevation of 925.5 ft which will be above the 100-year flood elevation of the proposed stormwater management facilities by 1.91 feet. Because the separation between the proposed low floor elevation and the emergency overflow of the stormwater management facility is 3.12 feet, which is greater than the required 1 foot separation, the project is in conformance with Rule J, Subsection 3.6a.

Structure	Low Floor Elevation of Building (feet)	100-year Event Flood Elevation of Adjacent Stormwater Facility (feet)	Freeboard to 100- year (feet)	Emergency Overflow Elevation of Adjacent Stormwater Facility (feet)	Vertical Separation Distance to Emergency Overflow (feet)
Vantage- Momentum Building	925.5	922.38	1.91	922.38	3.12

Stormwater management facilities must be constructed at an elevation and location that ensure no habitable structure will be brought into noncompliance with the low floor criteria according to Rule J, subsection 3.6b. The following table summarizes the low floor analysis for the existing habitable structures adjacent to the proposed stormwater facilities. Because the provided freeboard is greater than 2 feet, the elevation and location of the proposed stormwater facility meets the existing habitable structure requirement in Rule J, Subsection 3.6.b.

Adjacent Habitable Structure	Low Floor Elevation of Building (feet)	100-year Event Flood Elevation of Adjacent Stormwater Facility (feet)	Freeboard (feet)
Clear Springs Elementary School	931.24	923.59	7.65
Clear Springs Elementary School Gymnasium Addition	929.82	923.59	6.23
Private Residence at 18154 Covington Road	932	923.59	8.41

Maintenance

Subsection 3.7 of Rule J requires the submission of maintenance plan. All stormwater management structures and facilities must be designed for maintenance access and properly maintained in perpetuity to assure that they continue to function as designed. While the applicant provided a draft post construction maintenance agreement for review, the following revisions are needed:

J1. The applicant must work with RPBCWD to revise the maintenance and inspection agreement as needed and the applicant must execute the revised agreement after approval by RPBCWD.

Chloride Management

Subsection 3.8 of Rule J requires the submission of chloride management plan that designates the individual authorized to implement the chloride management plan and the MPCA-certified salt applicator engaged in implementing the plan. A compliant chloride management plan was provided by the applicant on March 19, 2021.

Wetland Protection

Because the proposed activities discharge to a downstream WCA protected wetland and alter the discharge the wetland receives from the site, the project must conform to RPBCWD wetland protection criteria (Rule J, subsection 3.10). The applicant provided and the Engineer concurs with the below analysis of potential wetland impacts based on Table J1 of RPBCWD Rule J.

The downstream wetland has been assessed as medium value. The following tables summarize the allowable change in bounce and inundation duration from Table J1 of RPBCWD Rule J as well as the applicant's analysis for wetland protection and the potential impacts on the wetland. The proposed project conforms to the wetland bounce and inundation requirements in Rule J, subsection 3.10a,.

Wetland Value/ Waterbody	4	Inundation Period for 10-Year Event	Runout Control Elevation
Medium	Existing +/- 1.0 feet	 Existing +14 days	0 to 1.0 ft above existing runout

Summary of allowable impacts on onsite wetland from Rule J, Table J1

Wetland	RPBCWD Wetland Value	Change in Bounce for, 10-Year Event (feet)			10-year change in Inundation Period (days)	Runout Control Elevation		
Downstream Wetland	Medium	0.1	<-0.1	<-0.1	<-0.1	No change		

Impacts of Project on Wetlands

Rule J, Subsection 3.10b requires that treatment of runoff to medium value wetlands archive 90 percent total suspended solids removal and 60 percent total phosphorus removal. The off-site wetland is a medium value wetland. P8 modeling results show the proposed underground infiltration system and existing stormwater pond provides 91.5% TSS and 73.6% TP removals, thus the engineer finds that the proposed project is in conformance with Rule J, Subsection 3.10b

Applicable General Requirements:

- 1. The RPBCWD Administrator and Engineer shall be notified at least three days prior to commencement of work.
- 2. Construction shall be consistent with the plans and specifications approved by the District as a part of the permitting process. The date of the approved plans and specifications is listed on the permit.
- 3. Construction must be consistent with the plans, specifications, and models that were submitted by the applicant that were the basis of permit approval. The date(s) of the approved plans, specifications, and modeling are listed on the permit. The grant of the permit does not in any way relieve the permittee, its engineer, or other professional consultants of responsibility for the permitted work.
- 4. The grant of the permit does not relieve the permittee of any responsibility to obtain approval of any other regulatory body with authority.
- 5. The issuance of this permit does not convey any rights to either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.
- 6. In all cases where the doing by the permittee of anything authorized by this permit involves the taking, using or damaging of any property, rights or interests of any other person or persons, or of any publicly owned lands or improvements or interests, the permittee, before proceeding therewith, must acquire all necessary property rights and interest.
- 7. RPBCWD's determination to issue this permit was made in reliance on the information provided by the applicant. Any substantive change in the work affecting the nature and extent of applicability of RPBCWD regulatory requirements or substantive changes in the methods or means of compliance with RPBCWD regulatory requirements must be the subject of an application for a permit modification to the RPBCWD.
- 8. If the conditions herein are met and the permit is issued by RPBCWD, the applicant, by accepting the permit, grants access to the site of the work at all reasonable times during and after construction to authorized representatives of the RPBCWD for inspection of the work.

Findings

- 1. The proposed project includes the information necessary, plan sheets and erosion control plan for review.
- 2. The proposed project will conform to Rules C and J if the Rule Specific Permit Conditions listed above are met.

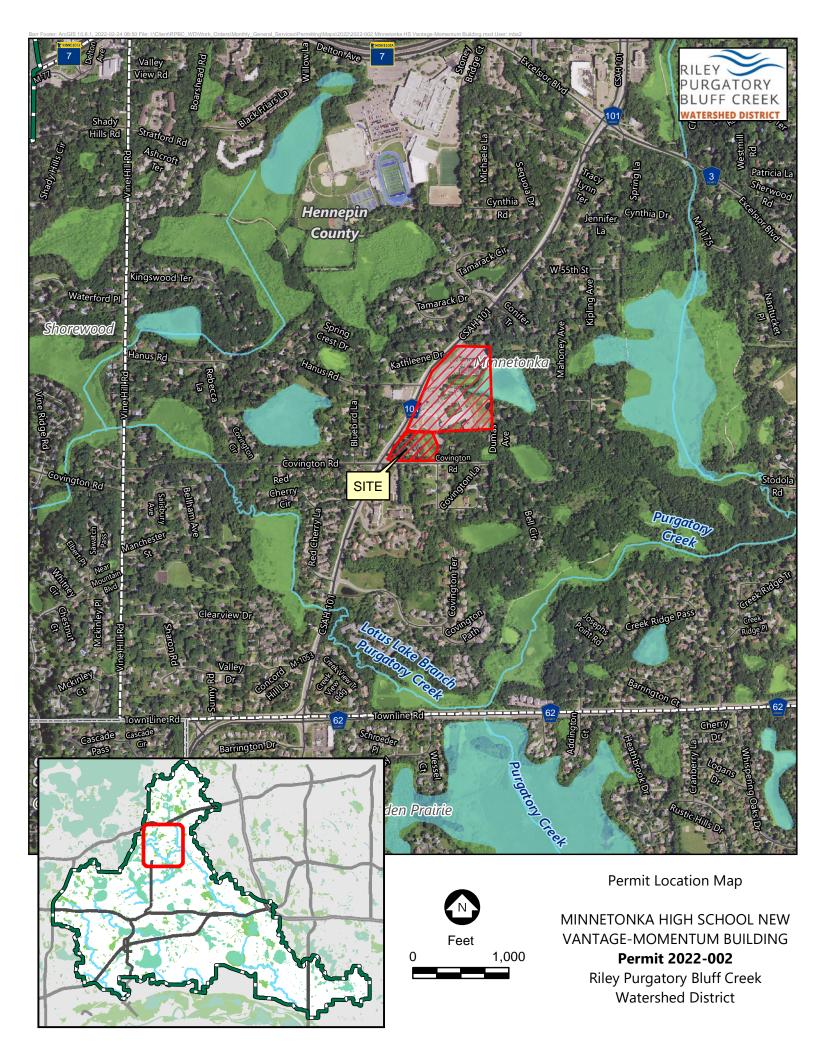
Recommendation:

Approval of the permit contingent upon:

- 1. Permit applicant must provide the name and contact information of the general contractor responsible for erosion and sediment control at the site. RPBCWD must be notified if the responsible party changes during the permit term.
- 2. The applicant must work with RPBCWD to revise the maintenance and inspection agreement as needed and the applicant must execute the revised agreement after approval by RPBCWD.

By accepting the permit, when issued, the applicant agrees to the following stipulations:

- 1. Continued compliance with General Requirements.
- 2. Per Rule J Subsection 5.6, upon completion of the site work, the permittee must submit as-built drawings demonstrating that at the time of final stabilization the stormwater management facilities conform to design specifications and functions as intended and approved by the District. As-built/record drawings must be signed by a professional engineer licensed in Minnesota and include, but not limited to:
 - a) the surveyed bottom elevations, water levels, and general topography of all facilities;
 - b) the size, type, and surveyed invert elevations of all stormwater facility inlets and outlets;
 - c) the surveyed elevations of all emergency overflows including stormwater facility, street, and other;
 - d) other important features to show that the project was constructed as approved by the Managers and protects the public health, welfare, and safety.
- 3. Providing the following additional close-out materials:
 - a) Documentation that constructed stormwater facilities perform as designed. This may include infiltration testing, flood testing, or other with prior approval from RPBCWD
 - b) Documentation that disturbed pervious areas remaining pervious have been decompacted per Rule C Subsection 3.2c criteria
- 4. Per Rule J, Subsection 3.1.b.ii measured infiltration capacity of the soils at the bottom of the underground infiltration system must be provided. The applicant must submit documentation verifying the infiltration capacity of the soils and that the volume control capacity is calculated using the measured infiltration rate. In addition, subsurface soil investigation is needed to verify adequate separation to groundwater (Rule J subsection 3.1.b.2). If infiltration capacity is less than needed to conform with the volume abstraction requirement in subsection 3.1.b or there is inadequate separation to groundwater, design modifications to achieve compliance with RPBCWD requirements will need to be submitted (in the form of an application for a permit modification or new permit).



NEW VANTAGE / MOMENTUM BUILDING TO SERVE MINNETONKA HIGH SCHOOL SITEWORK PACKAGE FOR THE PROPOSED **MINNETONKA, MN**



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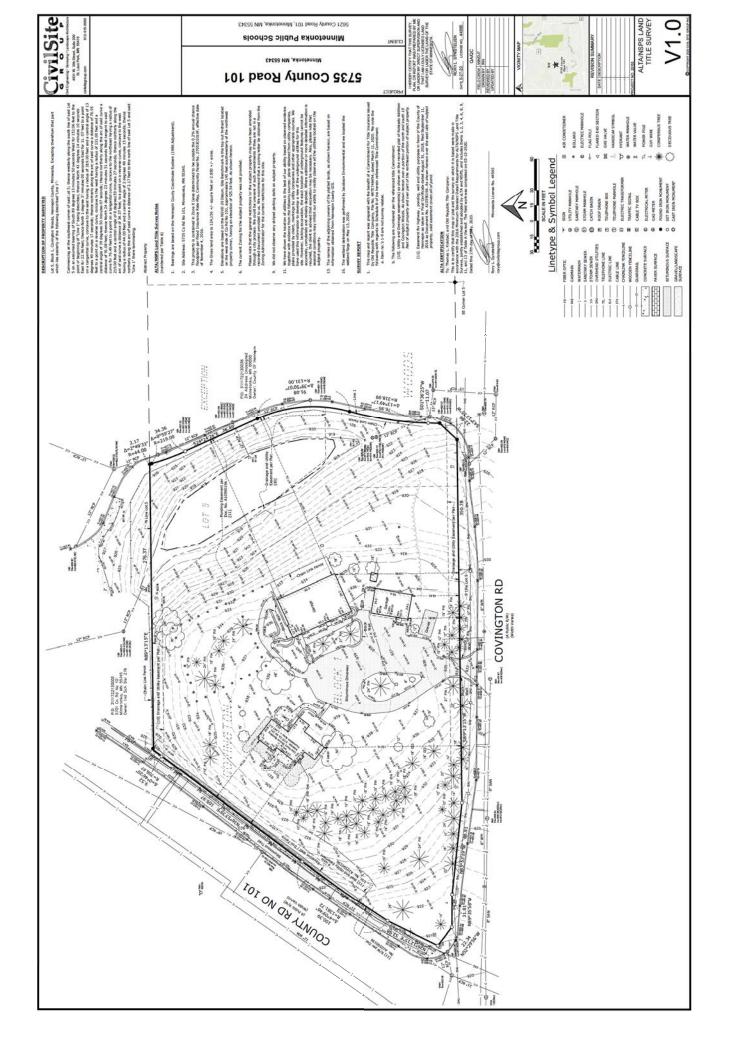
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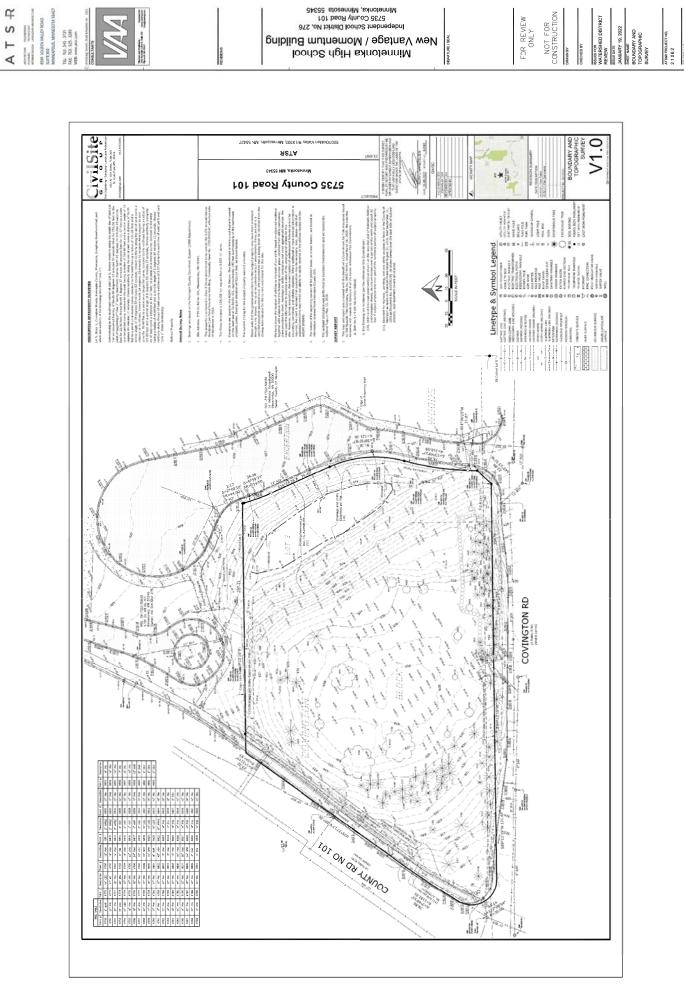
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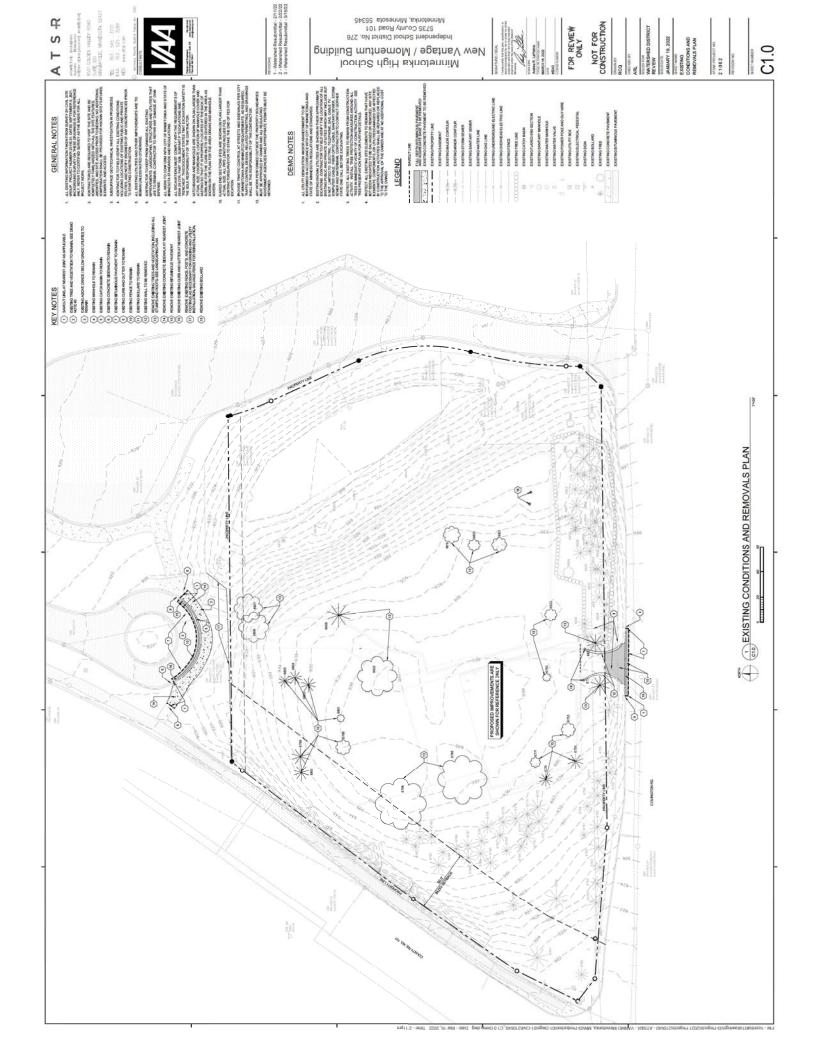


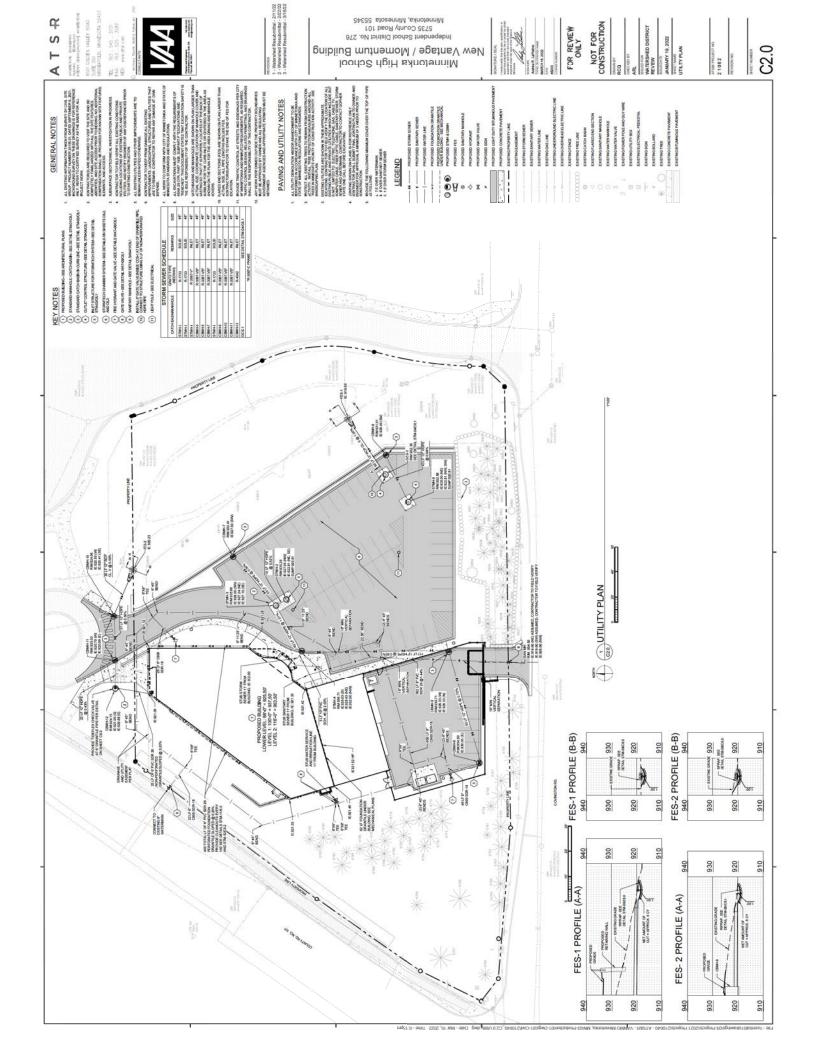


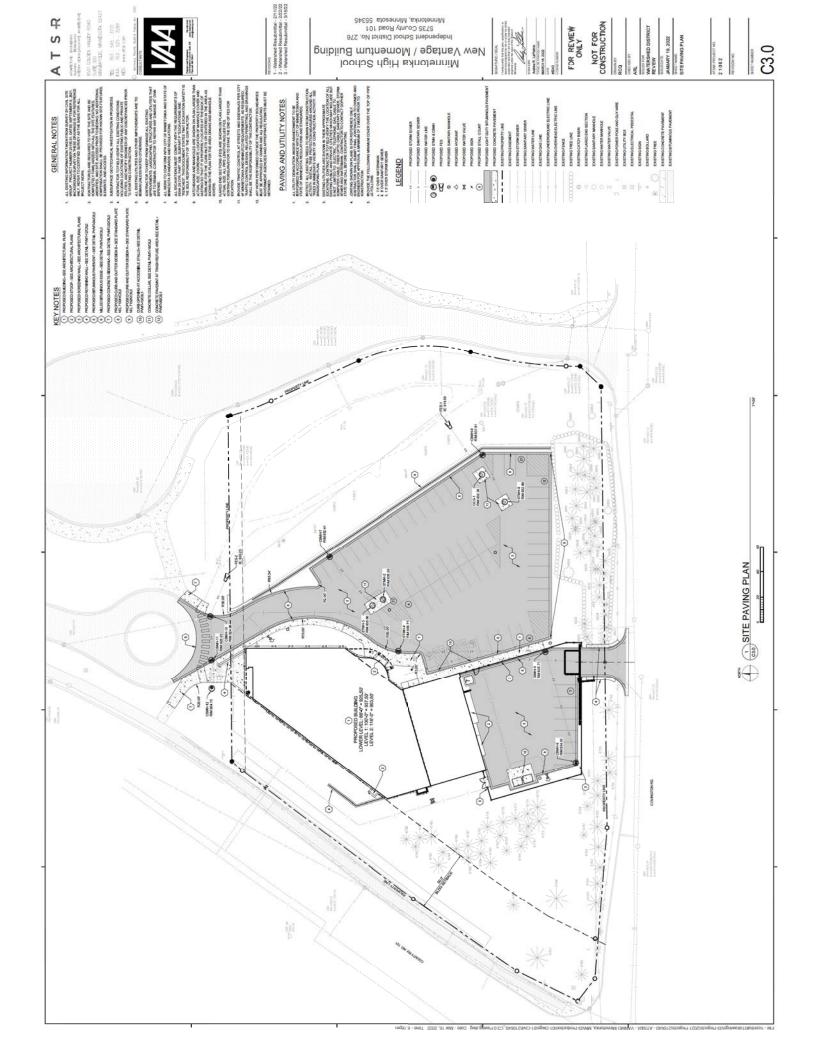
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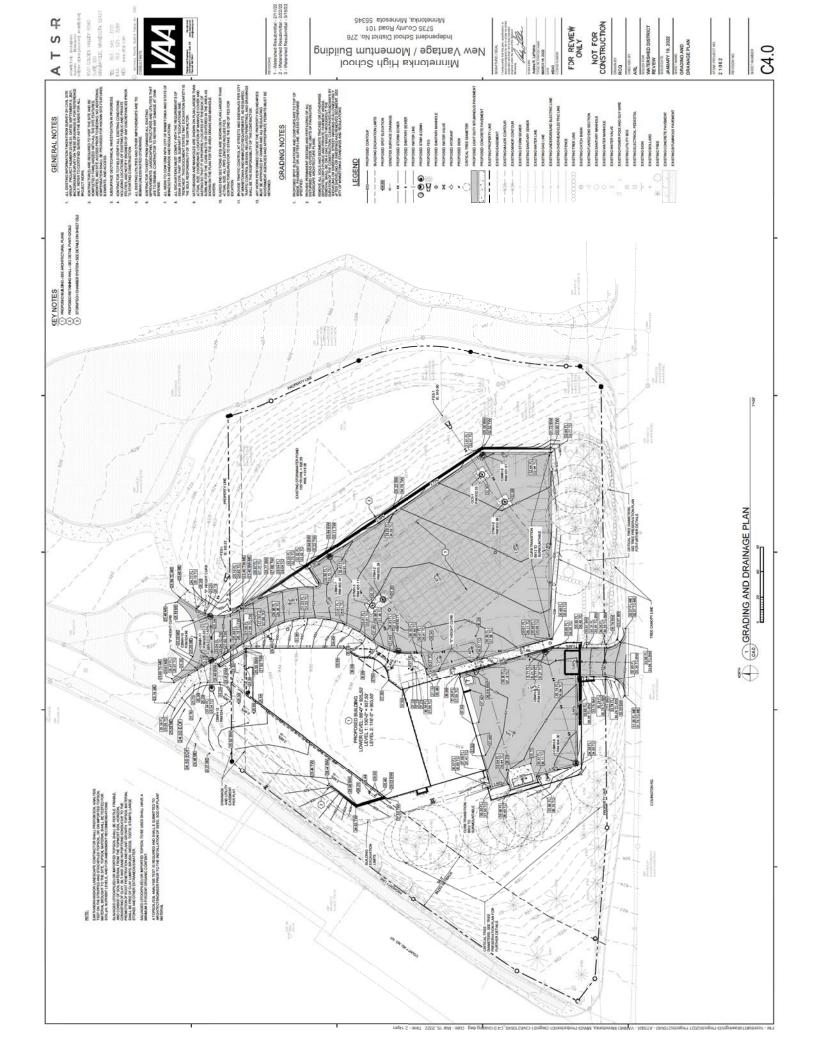
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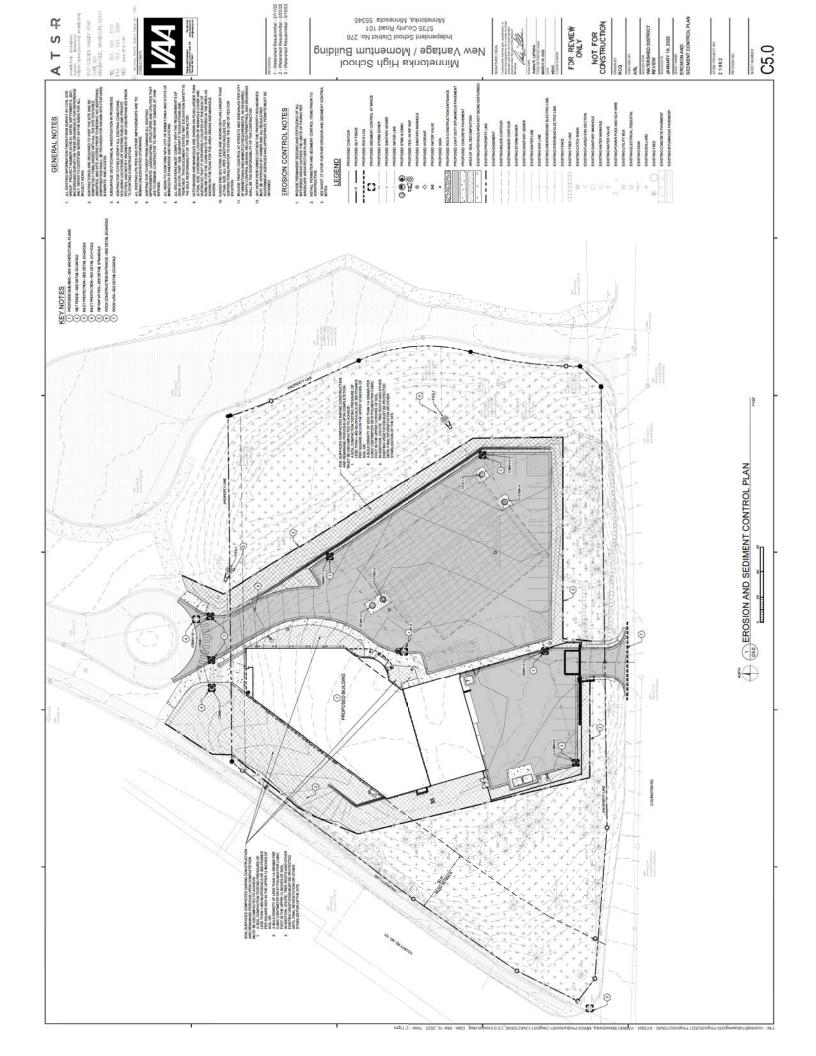
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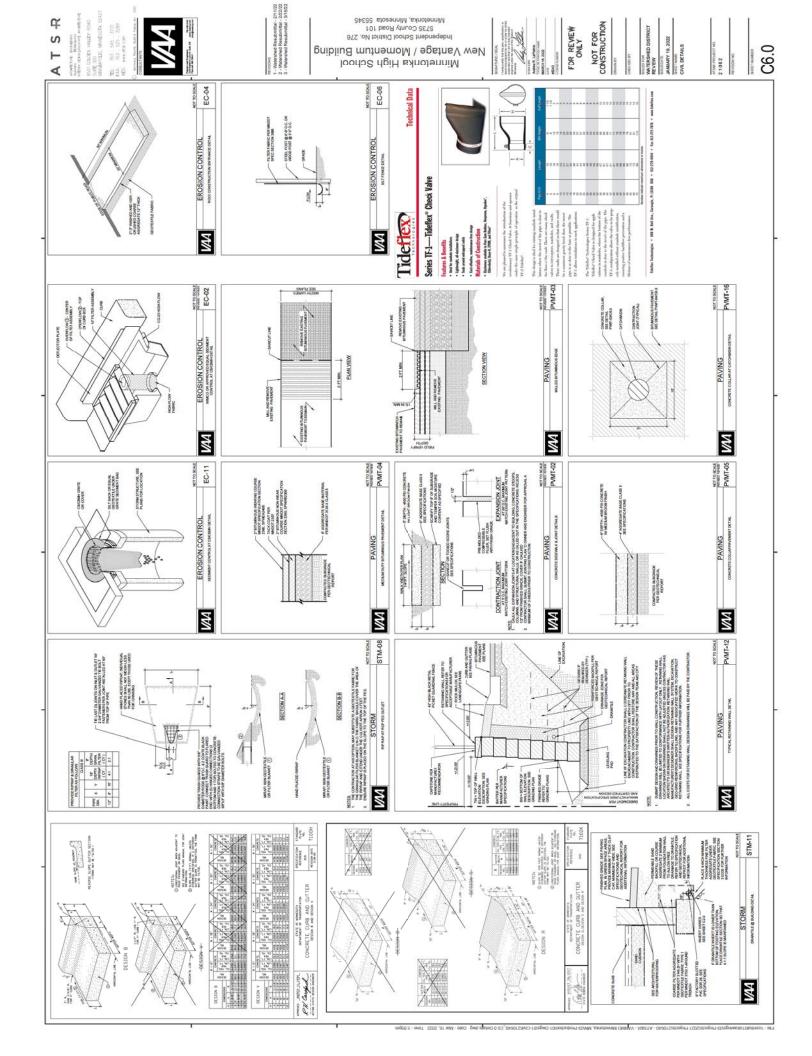


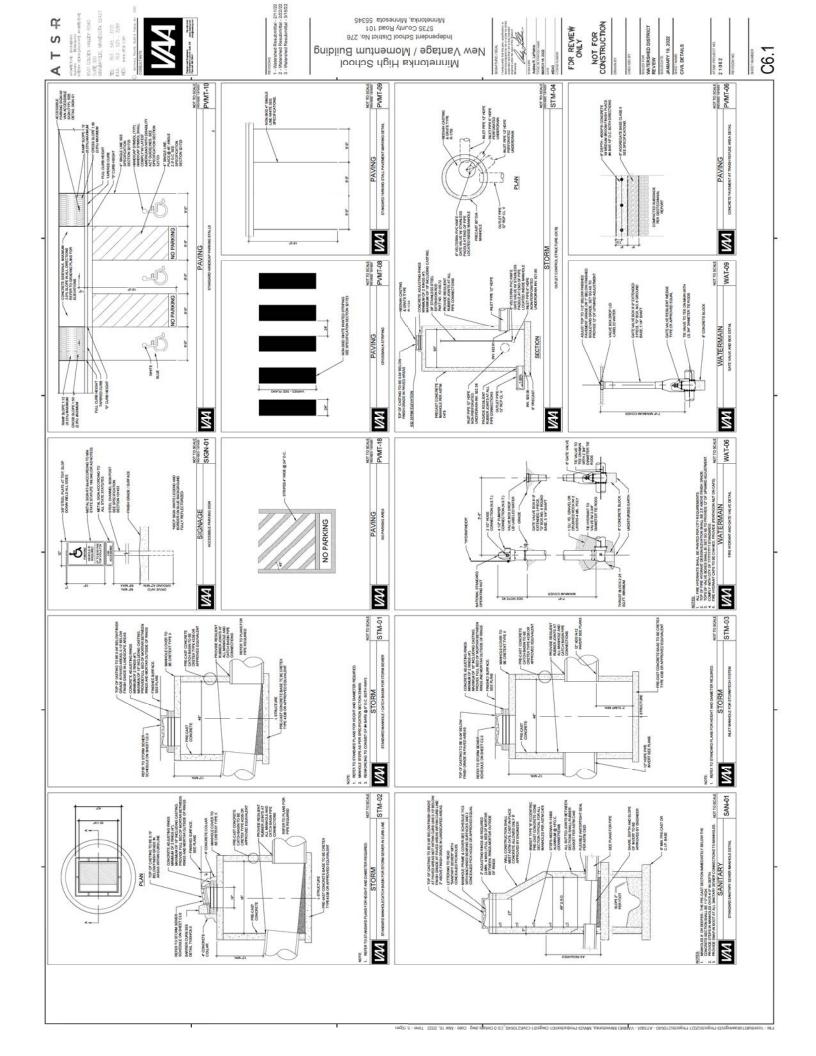


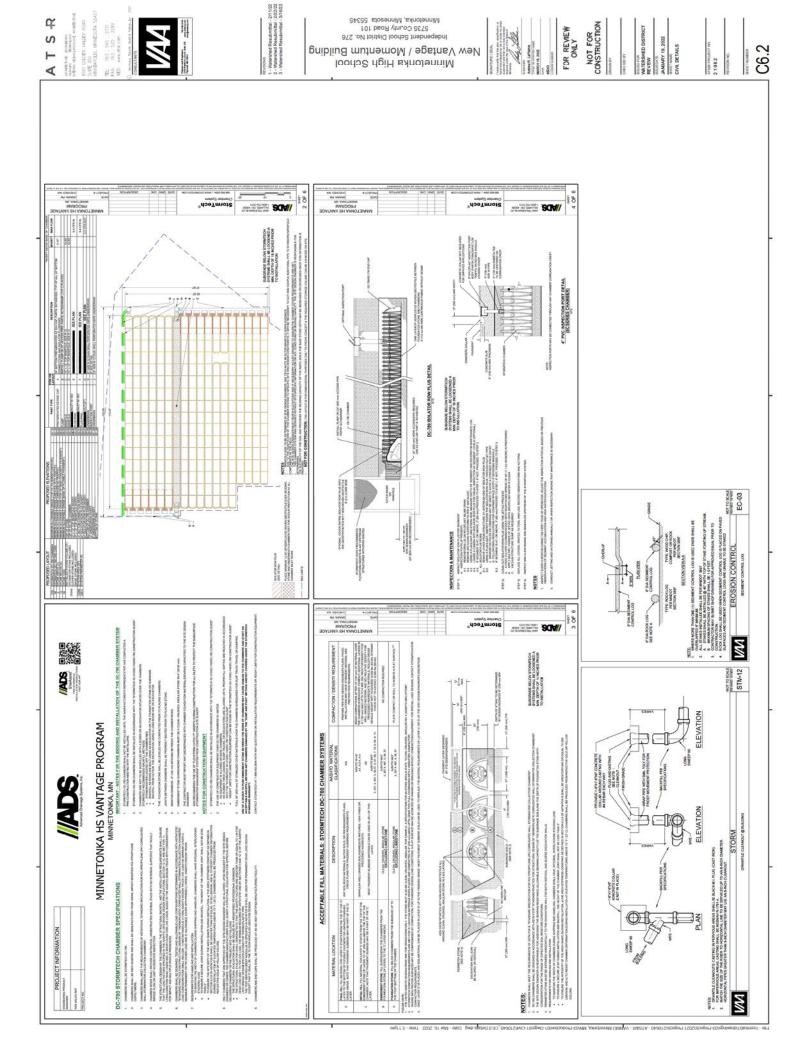


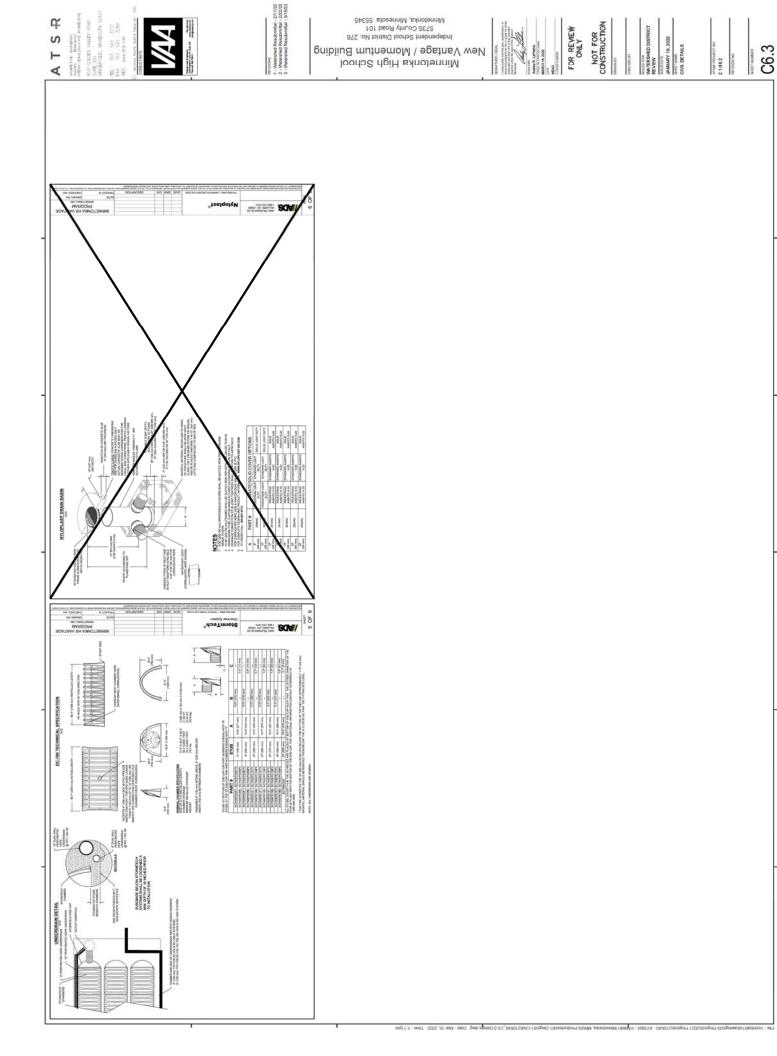












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