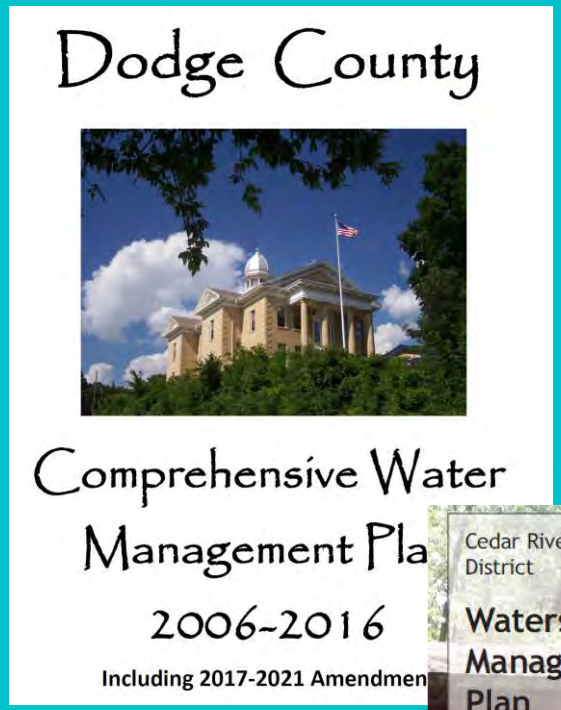
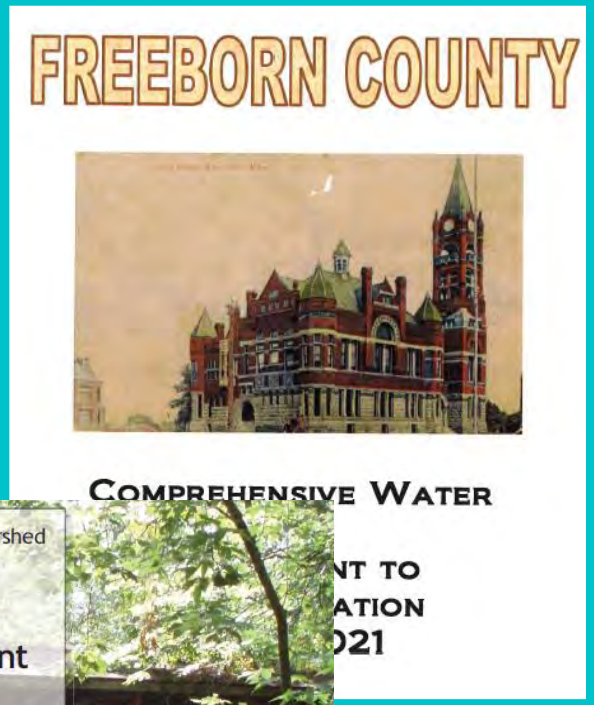
Leadership for Midwestern Watersheds

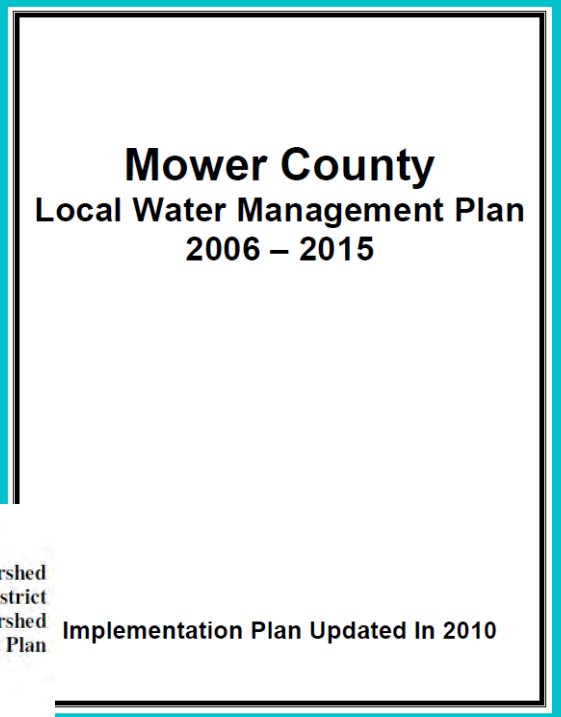
Watershed Partnerships - Minnesota Watersheds

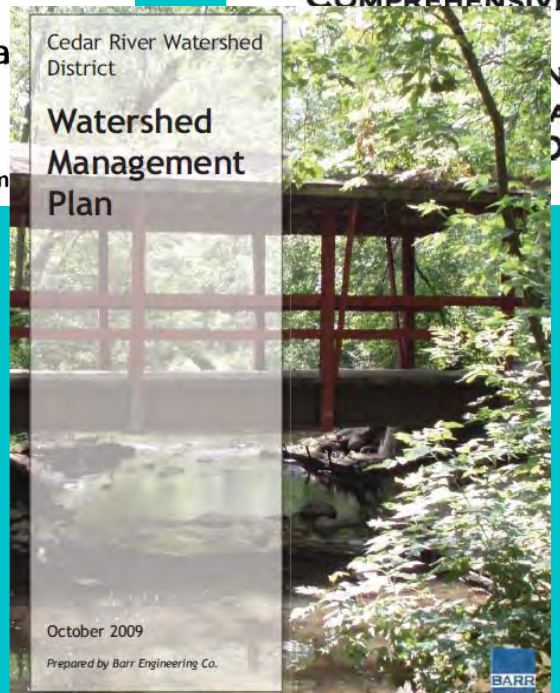
Adam King
Dodge Soil and Water Conservation District
District Manager
11/09/2023

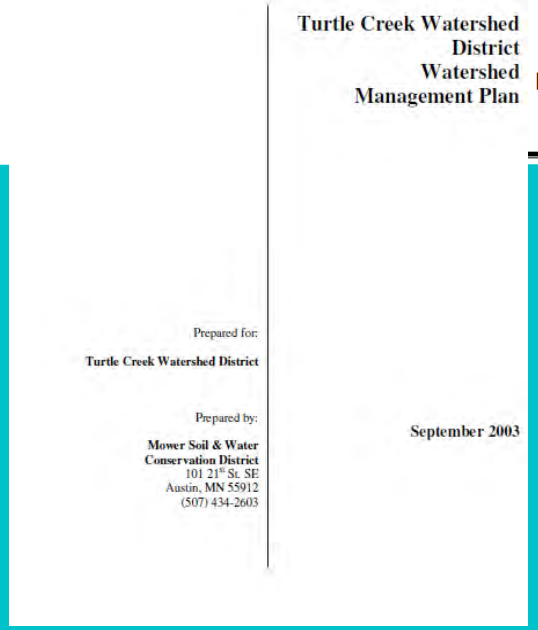
Leadership for Midwestern Watersheds











Leadership for Midwestern Watersheds

One Watershed – One Plan History

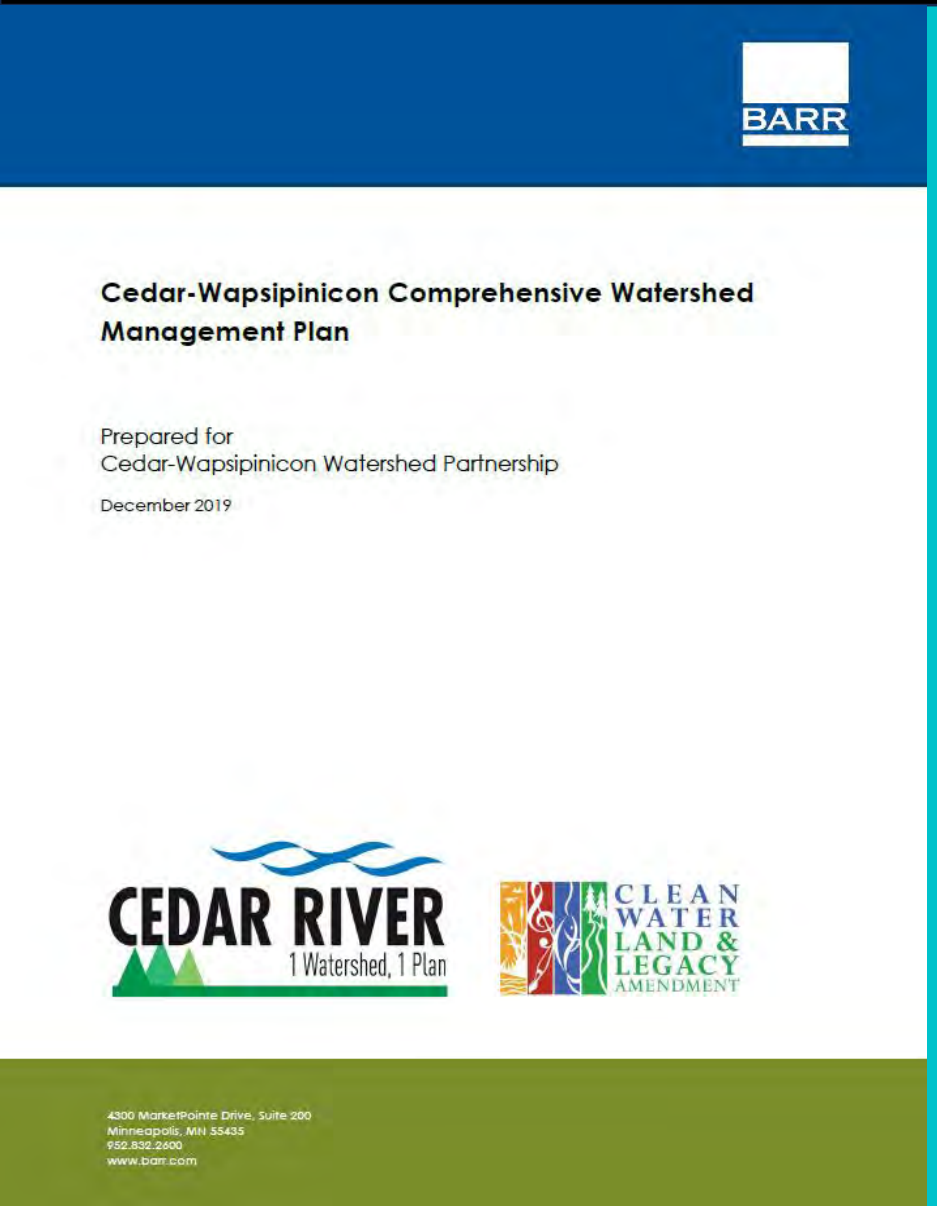
- Conduct Comprehensive Local Water Management on a Watershed basis, instead of a county boundary
- Streamlining the planning process to create a focus on project implementation
- Financial Incentives from the State of Minnesota, with a cost-effective method to distribution

November 25, 2013

Local Government Water Roundtable
Comprehensive Water Planning and Management
Policy Paper

Leadership for Midwestern Watersheds

One Watershed – One Plan
History



Develop a PRIORITIZED, TARGETED, and MEASURABLE local implementation plan.

One Watershed One Plan

CLEAN WATER LAND & LEGACY AMENDMENT

Leadership for Midwestern Watersheds

Prioritization

Relationships

Changing Times in Conservation Work

1W1P is part of a paradigm shift in how conservation work is done

In ag Country, SWCD's served individual farmers first

Watershed benefits were secondary

The Elected/Appointed group made a collaborative decision to go forward TOGETHER

Progress always moves at the speed of trust

We invested heavily in trust building early on, as it is our foundation that everything else is built off of

We managed to set aside turf and worked hard to create an inclusive group of staff, policy makers and partners

Still had a rocky start

Leadership for Midwestern Watersheds

Prioritization

Table 4-1 Geospatial Zonation inputs categorized by Zonation priorities

Zonation Priority	Geospatial Data Inputs
Reduce Erosion & Runoff	• Stream power index • Stream floodplains • Soil erosion risk • National wetlands inventory (NWI) • Topographic position index • Water yield (HSPF model results)
Protect or Improve Waters of Concern	• Drinking water supply management areas (DWSMAs) • Groundwater contamination susceptibility • Groundwater recharge • Total phosphorus loading (HSPF model results) • Total nitrogen loading (HSPF model results) • Sediment loading (SWAT model results)
Protect or Improve Lands of Concern	• Cultivated crops • Crop productivity index • Urban lands • Public lands • Stream buffers
Protect or Improve Fish & Wildlife Habitat	• Sites of biodiversity significance • Rare plants/animals • Lakes of biological significance

Table 4-2 Priority Issue Statements

Issue Group	Issue Statement
Accelerated Erosion & Sedimentation	Excessive erosion and sedimentation diminishes agricultural productivity, damages riparian areas, and degrades surface water quality and stream habitats.
Surface Water Quality Degradation	Surface water quality is threatened or impaired by pollutant loading and altered hydrology.
Excessive Flooding	Excessive flooding threatens public safety, property, and riparian ecology.
Groundwater Contamination	Groundwater quality is threatened by pollutant loading.
Degraded Soil Health	Degraded soil health diminishes agricultural productivity and limits the beneficial ecological functions of soil.
Threatened Groundwater Supply	Groundwater sustainability is at risk from consumptive use and loss of recharge.
Threats to Fish, Wildlife, and Habitat	Natural areas providing habitat and other ecological functions are threatened by land use conversion and other human activities.
Reduced Livability & Recreation	Connection to nature, outdoor recreation, and overall quality of life are reduced by the loss and degradation of natural resources.

Figure 4-3 Issue Group Paired Comparison Exercise - **EXAMPLE**

Instructions:
1. Work your way through each open square in the matrix one at a time.

2. For each open square:
2A. Consider only the **TWO** issue statement corresponding to its Row and Column.
2B. Decide which of the two issues statements (the row, and the column) is a higher priority, in your opinion, to address in this 1W1P.
2C. Indicate the higher priority issue in the square using the abbreviation (e.g., "ES" for the issue of excessive erosion and sedimentation).

3. In the "Total Occurrences" column, record the total number of times your selected that issue in a blank square (they should sum to 28).

Issue Statement	Code	SH	ES	SWQ	FL	GWQ	GWS	NR	LV
Degraded soil health diminishes agricultural productivity and limits the beneficial ecological functions of soil.	SH		ES	SH	SH	GWQ	SH	SH	SH
Excessive erosion and sedimentation diminishes agricultural productivity, damages riparian areas, and degrades surface water quality and stream habitats.	ES			ES	ES	GWQ	ES	ES	ES
Surface water quality is threatened or impaired by pollutant loading and altered hydrology.	SWQ				SWQ	GWQ	SWQ	SWQ	SWQ
Excessive flooding threatens public safety, property, and riparian ecology.	FL					GWQ	GWS	NR	FL
Groundwater quality is threatened by pollutant loading.	GWQ						GWQ	GWQ	GWQ
nsumptive use and loss of recharge.	GWS							NR	LV
ological functions are threatened by c stressors.	NR								LV
nd overall quality of life are reduced by s.	LV								

Total Occurrences	
SH =	5
ES =	6
SWQ =	4
FL =	1
GWQ =	7
GWS =	1
NR =	2
LV =	2

For example: I think degraded soil health (issue in this row) is a higher priority for the watershed to address than the threa to natural areas (issue in this column).

Therefore, I indicate "degraded soil health" as the higher priority using the issues statement abbreviation of "SH."

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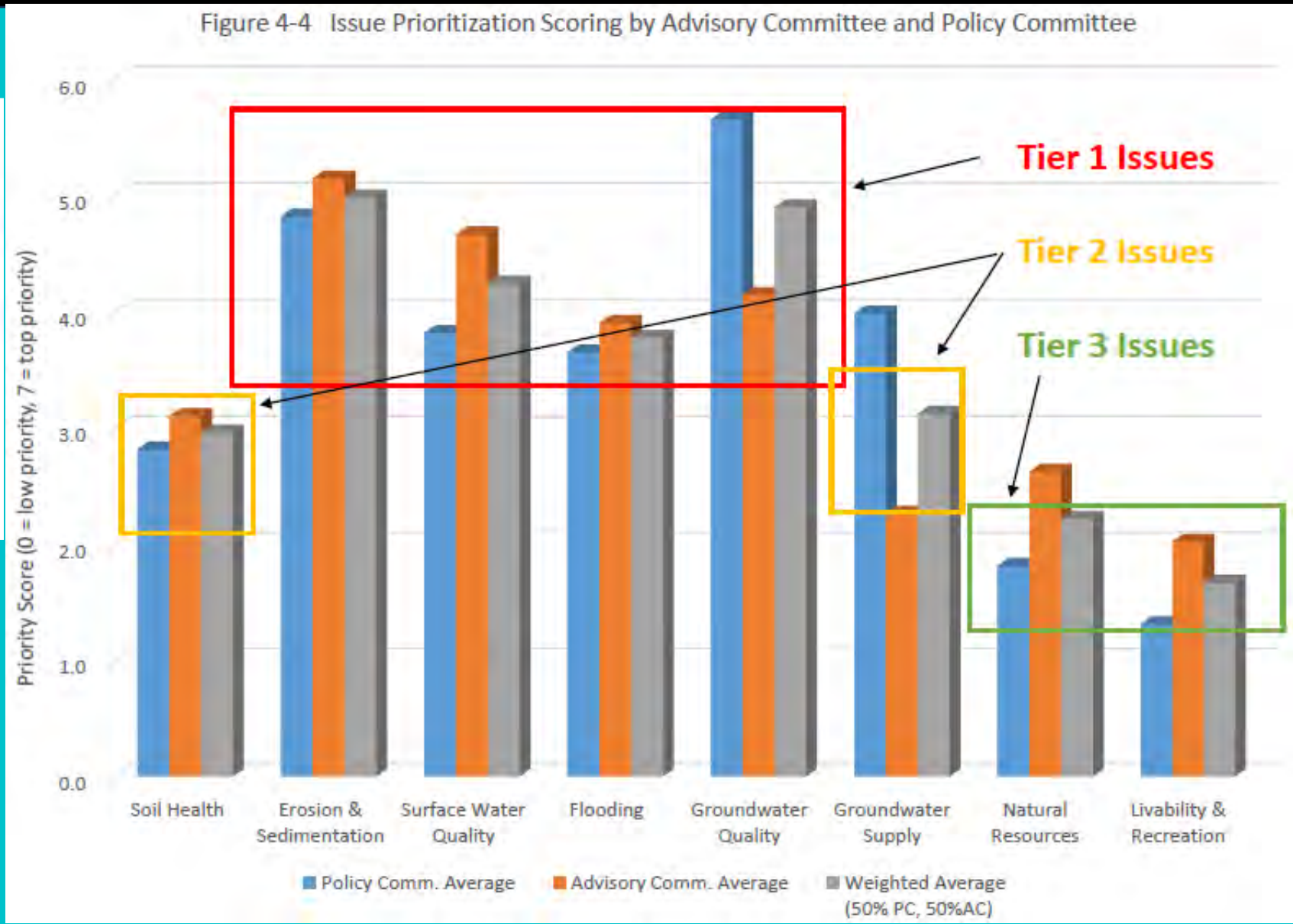
Prioritization



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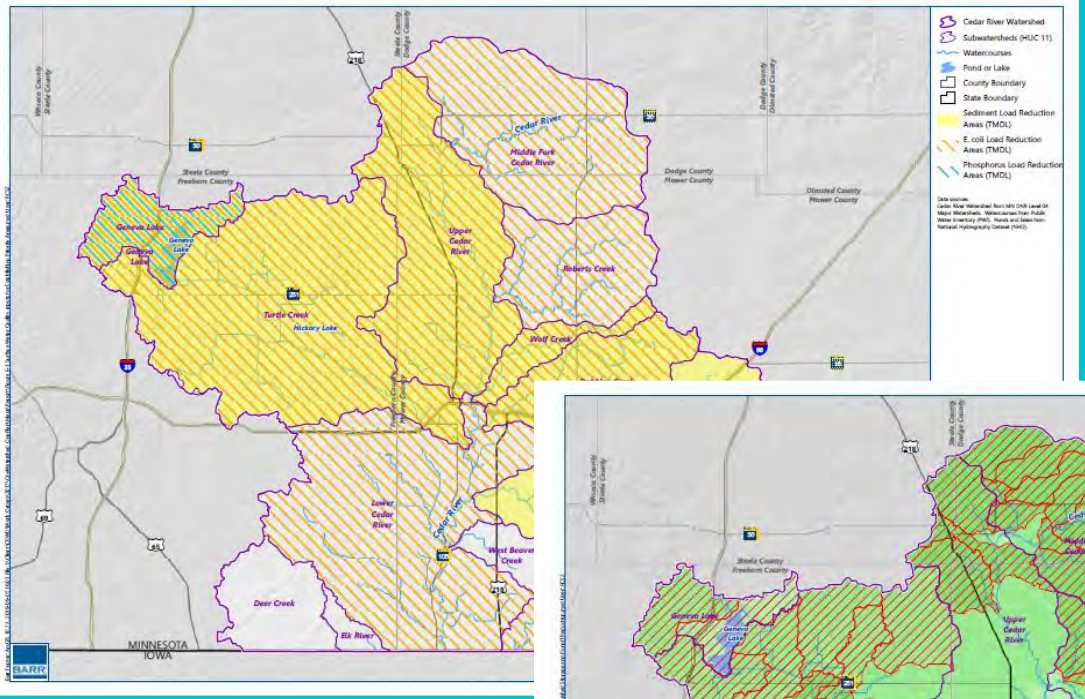
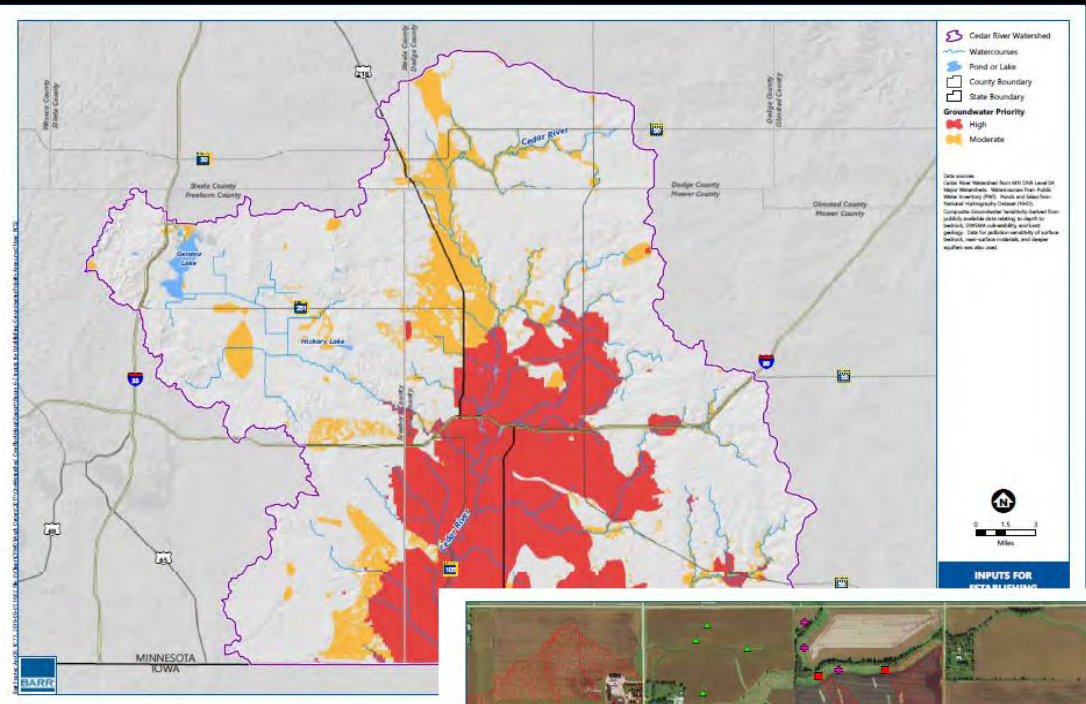
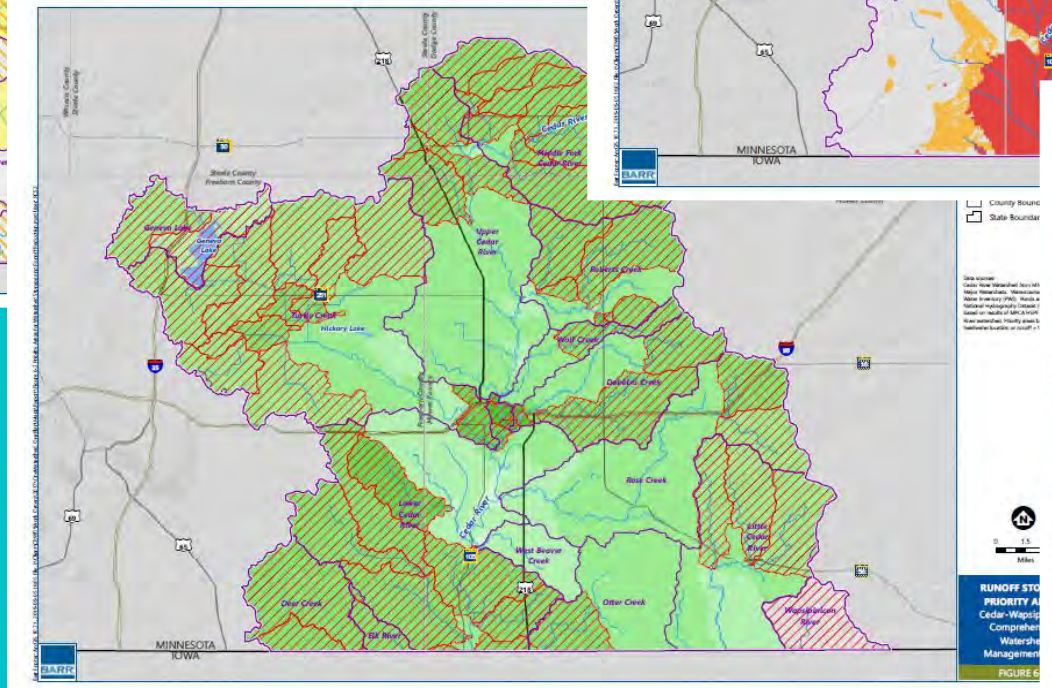
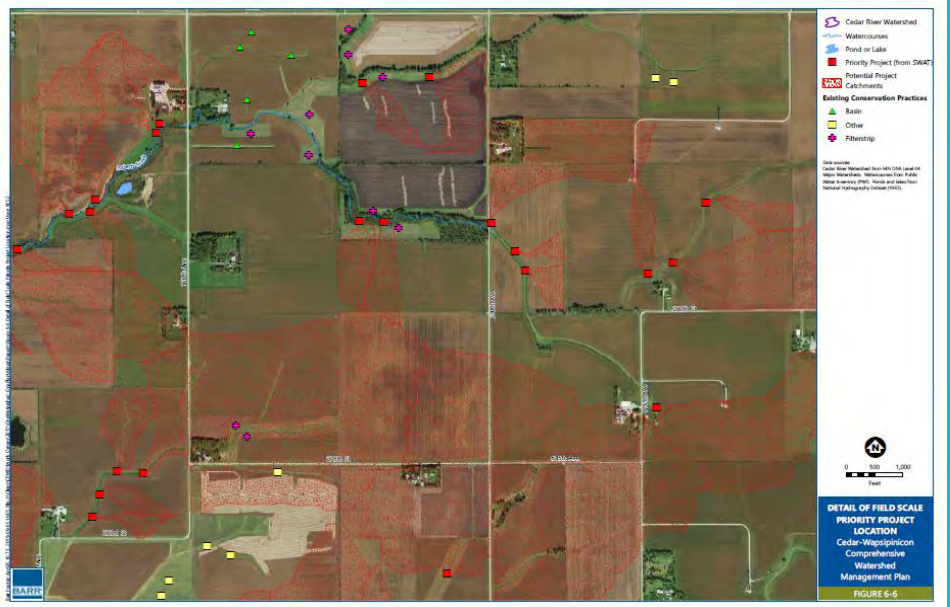
Targeting









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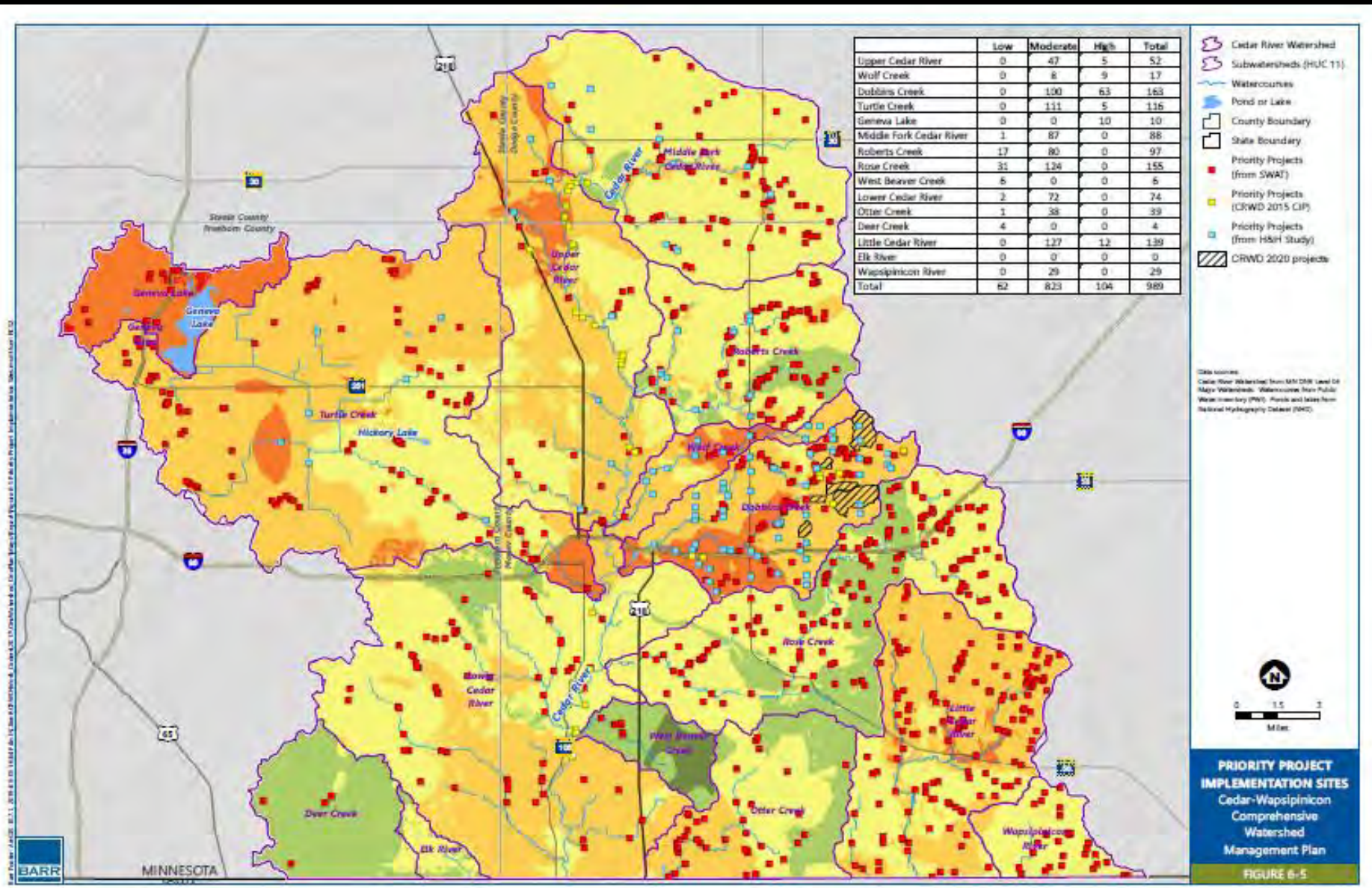
Targeting



Measurable Goals

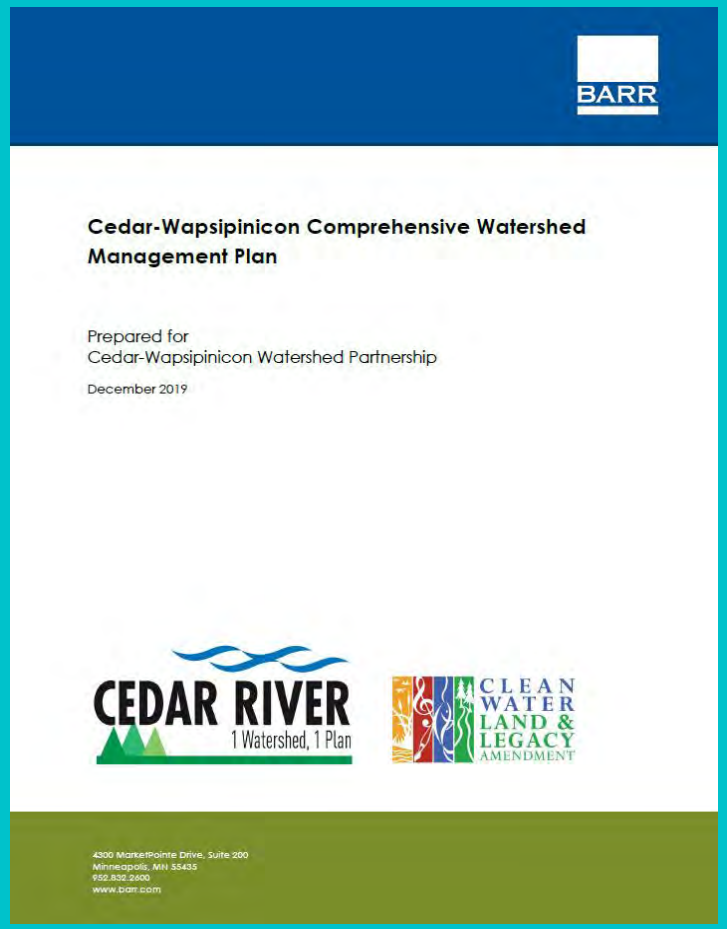
Table 5-3 Measurable Goals Addressing Degraded Surface Water Quality

Issue Area	Subwatershed	Specific Issue, Pollutant, or Stressor	Long-term Goal	Long-term Goal Rationale	10-year Goal	10-year Goal ID	10-year Goal Rationale or Source	10-year Goal Measures	Related Implementation Items (from Implementation Schedule)
Degraded Surface Water Quality	Upper Cedar River	Phosphorus	Reduce phosphorus loading by 45% (from average 1980-1996 conditions) by 2040	MN Nutrient Reduction Strategy (MPCA, 2014)	Implement structural and non-structural projects and practices to reduce watershed TP loading by up to 166 lbs/yr (as estimated at field scale) and 267 lbs/year in the Upper Cedar River	SWQ-1.1	Strategies included in WRAPS tables specific to this resource/watershed; field scale load reductions are based on HSPF model results and DTM analysis; in-resource goals are based on HSPF SAM and DTM analysis; see Section 6.4	Up to 10 implemented projects; watershed TP load reduction up to 166 lbs/yr (as estimated at field scale) and 267 lbs/year in the Upper Cedar River	SWQ-1, SWQ-2, SWQ-3, ESC-1, SWQ-14, FLD-8, SWQ-6, SWQ-7, SWQ-8, SWQ-9, SLH-2
		Total Suspended Solids	Reduce TSS concentrations to <10% of samples exceeding 65 mg/L (April 1 – September 30) by reducing TSS loading in the watershed by 19% (see TMDL)	MN Water Quality Standard (MN Rules 7050.0222 Subp. 3, Subp. 4)	Implement structural and non-structural projects and practices to reduce watershed sediment loading by up to 540 tons/yr (as estimated at field scale) and 49 tons/year in the Upper Cedar River	SWQ-1.1	Strategies included in WRAPS tables specific to this resource/watershed; field scale load reductions are based on SWAT model results and DTM analysis; in-resource goals are based on HSPF SAM and DTM analysis; see Section 6.4	Up to 10 implemented projects; cumulative sediment load reduction up to 540 tons/year (as estimated at field scale) and 49 tons/year in the Upper Cedar River	SWQ-1, SWQ-2, SWQ-3, ESC-1, SWQ-14, FLD-8, ESC-4, SWQ-6, SWQ-7, SWQ-8, SWQ-9, SLH-2
		Nitrate	Reduce total nitrogen loading by 45% (from average 1980-1996 conditions) by 2040	MN Nutrient Reduction Strategy (MPCA, 2014)	Implement structural and non-structural projects and practices to reduce watershed N loading by up to 12,400 lbs/year (as estimated at field scale) and 44,000 lbs/year in the Upper Cedar River	SWQ-1.1	Strategies included in WRAPS tables specific to this resource/watershed; field scale load reductions are based on HSPF model results and DTM analysis; in-resource goals are based on HSPF SAM and DTM analysis; see Section 6.4	Up to 10 implemented projects; cumulative N load reduction up to 12400 lbs/yr (as estimated at field scale) and 44,000 lbs/year in the Upper Cedar River	SWQ-1, SWQ-2, GWQ-3, SWQ-11, GWQ-15, SWQ-6, SWQ-7, SWQ-8, SWQ-9, SLH-2
		E. coli	Reduce *E. coli* concentrations to monthly geometric means <126 CFU/100 mL (April 1 – October 31) by reducing *E. coli* loading in the watershed by 72% (see TMDL)	MN Water Quality Standard (MN Rules 7050.0220 Subp. 3a.D, Subp. 4a.D, and Subp. 5a.D); Cedar River Watershed TMDL	Implem... to reduc...				
		Fish Index of Biological Integrity	Achieve applicable Fish Indices of Biological Integrity for streams: - Southern Streams: 50 - Southern Headwaters: 55	Biological Criteria for Tiered Aquatic Life Uses (MPCA, 2016); Cedar River Watershed Assessment and Monitoring - Appendix 4.2 (MPCA, 2012)	Implem... to impro...				
		Macroinvertebrate Index of Biological Integrity	Achieve applicable Macroinvertebrate Indices of Biological Integrity for streams: - Southern Forest Streams (low gradient): 43	Biological Criteria for Tiered Aquatic Life Uses (MPCA, 2016); Cedar River Watershed Assessment and Monitoring - Appendix 4.3 (MPCA, 2012)	Implem... to impro...				
		Phosphorus	Reduce phosphorus loading by 45% (from average 1980-1996 conditions) by 2040	MN Nutrient Reduction Strategy (MPCA, 2014)	Implem... and prac... up to 4.5 lbs/year				

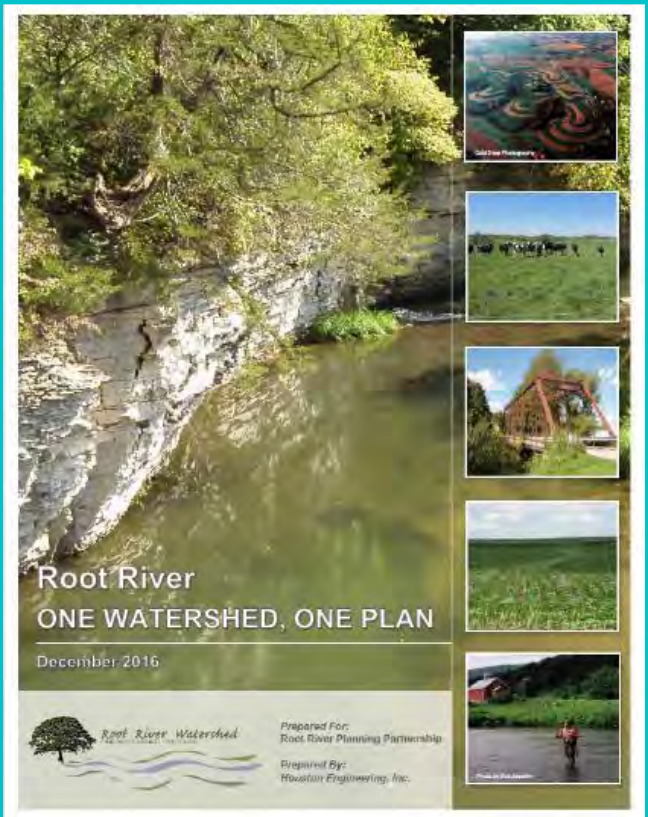
Drainage	Treatment Group Type & Number of BMPs	Cost	Issue	Unit	Existing Conditions	Quantitative Measurable Goal				PTMApp Scenario Reduction	5 year Load Reduction Goal	10 year Load Reduction Goal	10 yr. Progress towards Measurable Goal (%)
						Metric	Amount (%)*	Target Load Reduction	Year				
Drainage to Mississippi River	Storage (244) Filtration (78) Infiltration (3) Source Reduction (812)	$6,437,605	Sediment	tons/yr	116,416	Annual Load (mass/yr.)	45	52,387	2025	14,488	7,244	14,488	28
			Nutrients: Total Nitrogen	lbs/yr	10,848	Annual Load (mass/yr.)	45	4,882	2040	112	56	112	2
			Nutrients: Total Phosphorus	lbs/yr	134	Annual Load (mass/yr.)	45	60	2025	12	6	12	20
			Excess Runoff: 2 Year	acre feet	71,177	2-Yr. Runoff Volume	25	17,794	2030	N/A	N/A	N/A	N/A
			Excess Runoff: 10 Year	acre feet	167,868	2-Yr. Runoff Volume	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Drainage to Upper Iowa River	Storage (44) Filtration (15) Source Reduction (268)	$1,410,038	Sediment	tons/yr	112,249	Annual Load (mass/yr.)	45	50,512	2025	27,776	13,888	27,776	55
			Nutrients: Total Nitrogen	lbs/yr	32,828	Annual Load (mass/yr.)	45	14,773	2040	3,285	1,642	3,285	22
			Nutrients: Total Phosphorus	lbs/yr	2,024	Annual Load (mass/yr.)	45	911	2025	360	180	360	40
			Excess Runoff: 2 Year	acre feet	7,781	2-Yr. Runoff Volume	25	1,945	2030	N/A	N/A	N/A	N/A
			Excess Runoff: 10 Year	acre feet	17,036	2-Yr. Runoff Volume	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Leadership for Midwestern Watersheds

Now we have a
Prioritized,
Targeted,
State Approved,
Comprehensive Watershed Management Plan
in order to achieve the best Measurable Results.



NOW WHAT?



Leadership for Midwestern Watersheds

IMPLEMENTATION

Administration and Coordination

CEDAR – WAPSIPINICON COMPREHENSIVE WATERSHED MANAGEMENT PLAN
MEMORANDUM OF AGREEMENT

RESOLUTION 20-140

This Agreement is made and entered into by and between:

The Counties of Dodge, Freeborn, Mower, and Steele by and through their respective County Board of Commissioners, and

The Dodge, Freeborn, Mower, and Steele Soil and Water Conservation Districts, by and through their respective Soil and Water Conservation District Board of Supervisors, and

The Cedar River, and Turtle Creek Watershed Districts, by and through their respective Board of Managers, and

The City of Austin, by and through their City Council;

Collectively referred to as the "Parties."

WHEREAS, the Counties of this Agreement are political subdivisions of the State of Minnesota, with authority to

Local Implementation Work Group (LIWG) – made up of local staff – handle logistics

Technical Advisory Committee (TAC) – made up of state and local staff and stakeholders

Policy Advisory Committee (PAC) – made up of elected/appointed officials

Day to Day Contact – appointed annually

Fiscal Agent – appointed for each source of funding

Leadership for Midwestern Watersheds

IMPLEMENTATION

Activities

Broken down into:
Projects and Practices;
Monitoring Activities and Studies;
Education and Public Involvement Activities;
Regulatory and Administrative Activities

Table 7-2 Cedar-Wapsipinicon Comprehensive Watershed Management Plan Implementation Schedule

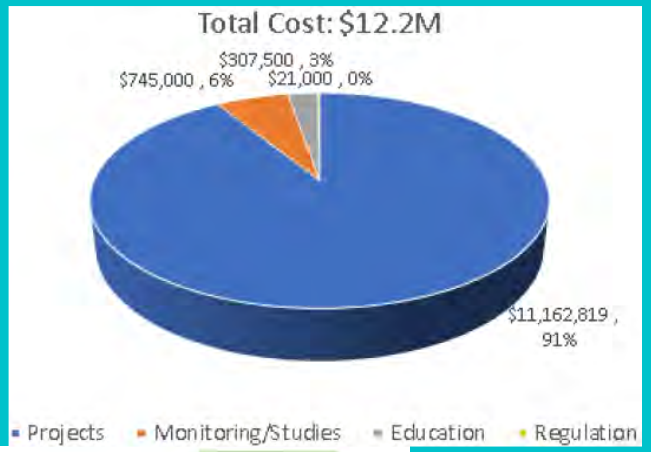
Item ID	Implementation Action Description	Applicable Goals (see Table 6-1)	Priority Issues Addressed: Tier I: Degraded Surface Water Quality	Tier I: Accelerated Erosion and Sedimentation	Tier I: Groundwater Contamination	Tier I: Groundwater Overdraft	Tier II: Degraded Soil Health	Tier II: Threatened Groundwater Supply	Tier III: Threats to Life, Wildlife, and Habitat	Tier III: Reduced Livability and Recreation	Target or Focus Area	Measurable Output	Timeframe (Values are incremental for each 2-year period): 2020-21	2022-23	2024-25	2026-27	2028-29	Estimated Total Cost	Estimated Local Contribution	Estimated External Contribution	Lead LGU	Supporting Entities	Notes
Projects and Project Support																							
SWQ-1	Implement BMPs at very high priority and high priority sites identified through SWAT modeling and GIS terrain analyses (see Figure 6-5) to reduce erosion and filter pollutants; specific BMPs to be determined based on site-specific feasibility, with target implementation by subwatershed as follows:	SWQ-1, SWQ-2, ESC-1, ESC-2, GWQ-5, FLD-1, SLH-1, GWS-1, FWH-5, REC-1	●	●	○	□	○	○	○	○	Priority Project Areas (see Figure 5-4)	Number of projects implemented and corresponding reduction in pollutant loading	Numbers below indicate planned number of projects per biennium, by watershed					See below	See below	See below	SWCD CRWD TCWD County	MDNR NRCS BWSR MDA	
	Upper Cedar River	SWQ-1.1	●	●	○	□	○	○	○	○	Level 2, 3, 4	10 projects over 10 years	2	2	2	2	2	$ 340,000	$ 170,000	$ 170,000			
	Wolf Creek	SWQ-1.2	●	●	○	□	○	○	○	○	Level 2, 3, 4	3 projects over 10 years	1	1	1			$ 11,340	$ 5,670	$ 5,670			
	Dobbins Creek	SWQ-1.3	●	●	○	□	○	○	○	○	Level 3, 4	20 projects over 10 years	4	4	4	4	4	$ 225,766	$ 112,883	$ 112,883			
	Turtle Creek	SWQ-1.4	●	●	○	□	○	○	○	○	Level 2, 3, 4	20 projects over 10 years	4	4	4	4	4	$ 425,000	$ 212,500	$ 212,500			
	Geneva Lake	SWQ-1.5	●	●	○	□	○	○	○	○	Level 4, 5	5 projects over 10 years	3	1	1			$ 97,200	$ 48,600	$ 48,600			
	Middle Fork Cedar River	SWQ-1.6	●	●	○	□	○	○	○	○	Level 1, 2, 3	20 projects over 10 years		5	5	5	5	$ 372,737	$ 186,868	$ 186,868			
	Roberts Creek	SWQ-1.7	●	●	○	□	○	○	○	○	Level 1, 2, 3	20 projects over 10 years		5	5	5	5	$ 382,299	$ 191,148	$ 191,148			
	Rose Creek	SWQ-1.8	●	●	○	□	○	○	○	○	Level 1, 2, 3	30 projects over 10 years	10	5	5	5	5	$ 515,265	$ 257,632	$ 257,632			
	West Beaver Creek	SWQ-1.9	●	●	○	□	○	○	○	○	Level 0, 1	3 projects over 10 years			1	1	1	$ 56,700	$ 28,350	$ 28,350			
	Lower Cedar River	SWQ-1.10	●	●	○	□	○	○	○	○	Level 1, 2, 3	15 projects over 10 years	3	3	3	3	3	$ 290,864	$ 145,432	$ 145,432			
	Otter Creek	SWQ-1.11	●	●	○	□	○	○	○	○	Level 1, 2, 3	8 projects over 10 years	2	2	2	2		$ 89,169	$ 44,585	$ 44,585			
	Deer Creek	SWQ-1.12	●	●	○	□	○	○	○	○	Level 1, 2	4 projects over 10 years		1	1	1	1	$ 75,600	$ 37,800	$ 37,800			
	Little Cedar River	SWQ-1.13	●	●	○	□	○	○	○	○	Level 2, 3, 4	30 projects over 10 years	10	5	5	5	5	$ 314,676	$ 157,338	$ 157,338			
	Elk River	SWQ-1.14	●	●	○	□	○	○	○	○	Level 1, 2	0 projects over 10 years						$ -	$ -	$ -			
	Wapsipinicon River	SWQ-1.15	●	●	○	□	○	○	○	○	Level 2, 3	10 projects over 10 years	2	2	2	2	2	$ 105,207	$ 52,603	$ 52,603			
	Total												41	40	41	39	37						
SWQ-2	Implement and/or expand cost share assistance programs to promote the use of BMPs focused on soil health (e.g., cover crops, conservation tillage - defined as no-till and strip-till)	SWQ-1, ESC-1, ESC-3, FLD-1, SLH-1, SLH-2, SLH-3, GWS-1	□	●	□	□	●	○			Agricultural Areas (emphasizing Upper Cedar, Lower Cedar, Otter Creek, West Beaver Creek, and Elk River)	Number of acres; Percent increase in coverage	370 acres added	540 acres added	830 acres added	1,370 acres added	2,630 acres added	$ 200,000	$ 100,000	$ 100,000	SWCD CRWD TCWD	NRCS MDA	
SWQ-3	Implement projects to reduce phosphorus and sediment loading in urban stormwater runoff (above and beyond current minimum requirements)	SWQ-1, ESC-3, FLD-1, GWS-1	●	●		□		●			Urban priority areas identified by City of Austin (and others)	Number of urban BMPs implemented (1 per year)	2	2	2	2	2	$ 80,000	$ 40,000	$ 40,000	Cities CRWD SWCD	MPCA MDA	Projects may include stormwater reuse, infiltration practices, disconnected impervious, etc.
													2	2	2	2	2	$ 3,500,000	$ 875,000	$ 2,625,000	County SWCD	NRCS MPCA MDA	
													5	5	5	5	5	$ 25,000	$ 25,000	$ -	SWCD CRWD County Cities TCWD	MDNR NRCS BWSR MDA MPCA	
													4 plans 20 visits	4 plans 20 visits	4 plans 20 visits	4 plans 20 visits	4 plans 20 visits	$ 200,000	$ 200,000	$ -	SWCD CRWD TCWD	NRCS MDA Private Sector	$10,000 per plan; separated from item SWQ-12
													4 plans 20 visits	4 plans 20 visits	4 plans 20 visits	4 plans 20 visits	4 plans 20 visits	$ 100,000	$ 100,000	$ -	SWCD CRWD TCWD	NRCS MDA Private Sector	$10,000 per plan; separated from item SWQ-11; leverage MPCA MMP planner where appropriate
													x					$ 5,000	$ 5,000	$ -	CRWD		
													x					$ 5,000	$ 5,000	$ -	TCWD		
													20	20	20	20	20	$ 100,000	$ 100,000	$ -	County SWCD	MDH	
													2 high capacity wells over 10 years					$ 20,000	$ 10,000	$ 10,000	Cities County	MDH	
													See SWQ-1, SWQ-2, SWQ-4					See SWQ-1, SWQ-2, SWQ-4	See SWQ-1, SWQ-2, SWQ-4	See SWQ-1, SWQ-2, SWQ-4	SWCD CRWD TCWD	County NRCS MDA	Practices incorporated into item SWQ-1

Action	Action Description	Management Category	Lead	Lead Entity	Partners	Cost per Year	Start Date	End Date
underground within the pores of rocks and soils and which reaches the ground surface.								
ain or improve the quality and quantity of drinking water supplies and the linkage between surface and subsurface hydrologic systems.								
GW-1.1	Implement BMPs that manage surface runoff within Drinking Water Supply Management Areas (DWSMAs), Source Water Protection Areas, and areas of high vulnerability to groundwater recharge such as sinkholes.	Field Practice	Local	SWCD	MDA, County, Cities, NRCS	See Field Practices Table (Table 4-7)		
GW-1.2	Seal abandoned and unused wells, particularly those wells which may impact public or private drinking water supplies, such as those found within DWSMAs.	Field Practice	Local	SWCD / County	MDA, MDH, NRCS	See Field Practices Table (Table 4-7)		
GW-1.3	Develop nitrogen fertilizer management plans for agricultural producers for locations that are vulnerable to groundwater contamination from nitrates, which follow Best Management Practice recommendations	Field Practice	Local	SWCD	NRCS, Crop advisors	See Field Practices Table (Table 4-7)		
GW-1.4	Complete the delineation and mapping of DWSMAs and the boundaries of Well Head Protection Areas.	Research	State	MDH	N/A	Existing Budget	Ongoing or Current Program	
GW-1.5	Use existing land use and zoning ordinances to manage possible sources of nitrate contamination (i.e., subsurface sewage treatment systems; manure management; land development).	Statutory/Ordinance	Local	County/City	N/A	Existing Budget	Ongoing or Current Program	
GW-1.6	Provide financial and technical assistance for the monitoring of nitrate levels in private wells.	Research	State / Local	MDA / County	SWCD	Existing Budget	Ongoing or Current Program	
GW-1.7	Continue research to define sinkhole locations, map springsheds in plan area, model and monitor groundwater, and monitor basic flow.	Research	State	DNR	MGS, MDH, SWCD	See Table 4-8	Ongoing or Current Program	

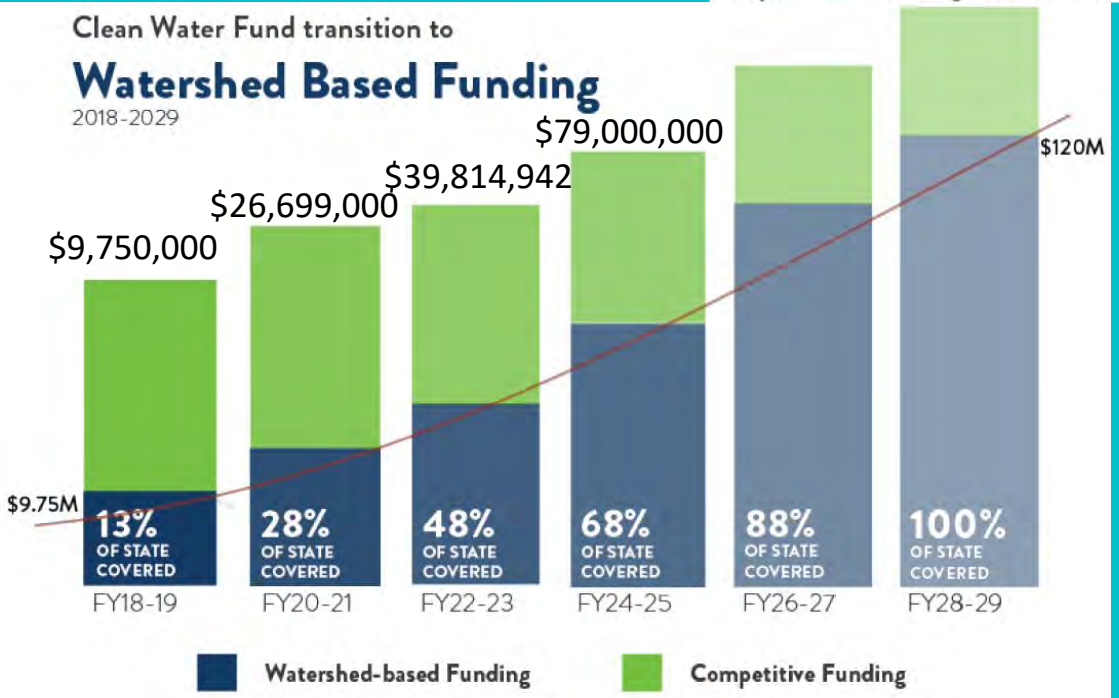
Leadership for Midwestern Watersheds

IMPLEMENTATION

Funding



Management Category	Total Funding Needs (over 10 years)
Field Practice [1]	$8,800,000
Statutory Obligations / Ordinances[2]	$2,000,000
Research[3]	$1,000,000
Education & Outreach[4]	$825,000
Additional Expenses	**Total Funding Needs (over 10 years)**
Plan Administration[5]	$1,780,000
Capital Improvements (2 during plan period)	$5,000,000
Total Estimated Funding Needs	**$19,405,000[6]**

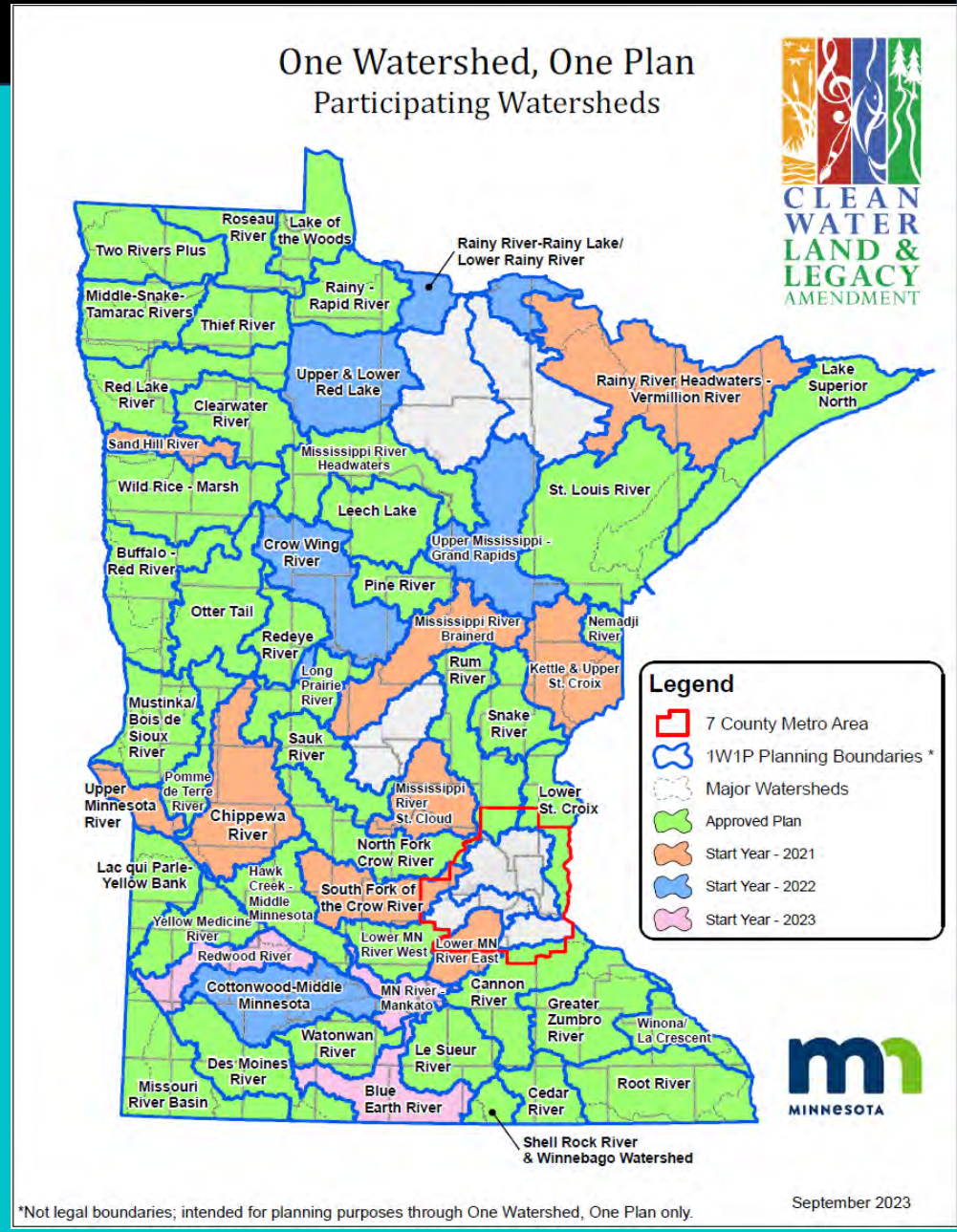


Percentage increases are approximate

						$ 10,000	$ 10,000	$ -	SWCD	BWSR, USDA
				EDUCATION TOTAL		$ 307,500	$ 145,000	$ 145,000		
		X				$ 10,000	$ 10,000	$ -	City of Austin	MPCA
		X				$ 1,000	$ 1,000	$ -	City of Austin, County	MDH, MDA
X	X	X	X	X	Included in existing operating budgets	Included in existing operating budgets	Included in existing operating budgets	County, SWCD, CRWD, TCWD	MDNR, BWSR, MPCA	
X					$ 5,000	$ 5,000	$ -	City of Austin, County	CRWD, TCWD, MDNR	
			X		$ 5,000	$ 5,000	$ -	City of Austin, County	MDNR	
				REGUL TOTAL	$ 21,000	$ 21,000	$ -			
				PLAN TOTAL:	$ 12,236,319	$ 7,022,319	$ 5,213,999			

Leadership for Midwestern Watersheds

But, what did we do before One Watershed One Plans?



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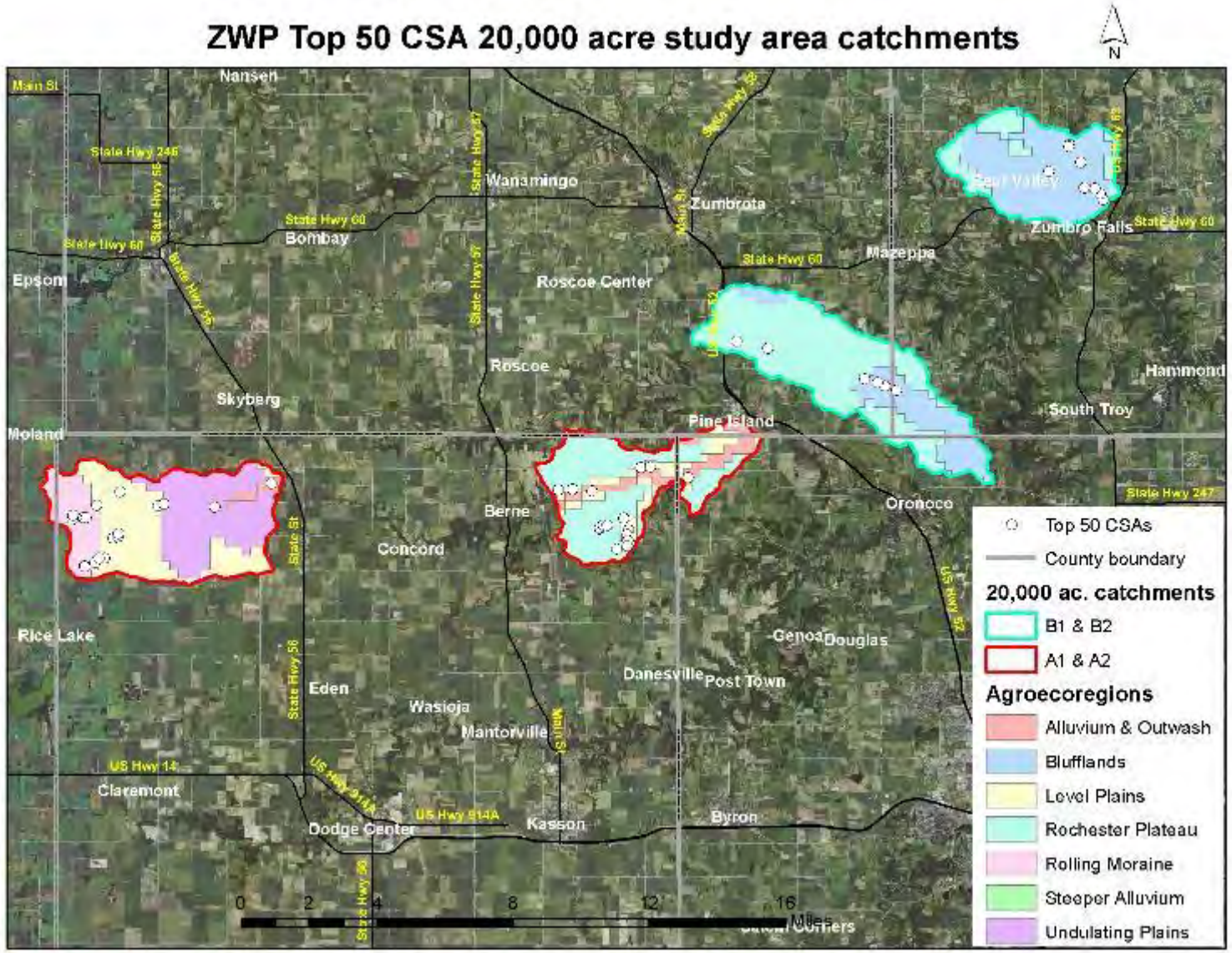


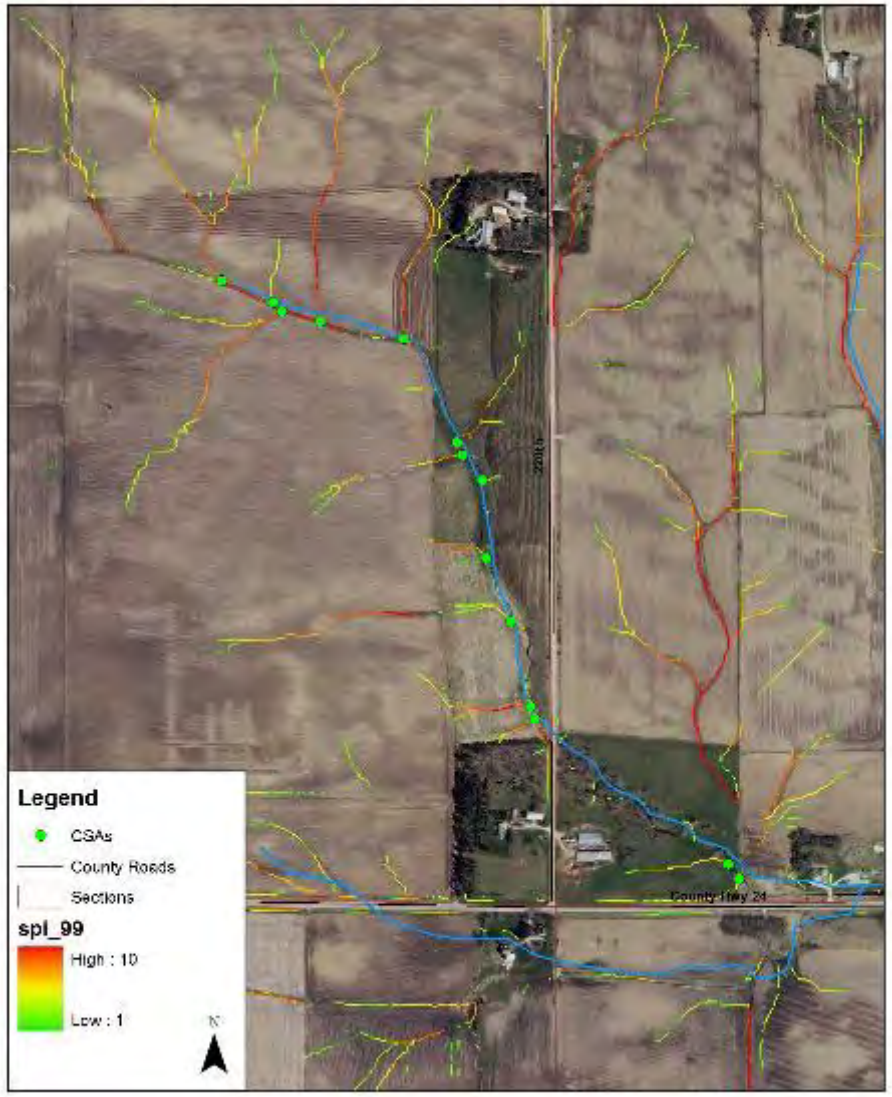
Protect Clean Enjoy

ZUMBRO

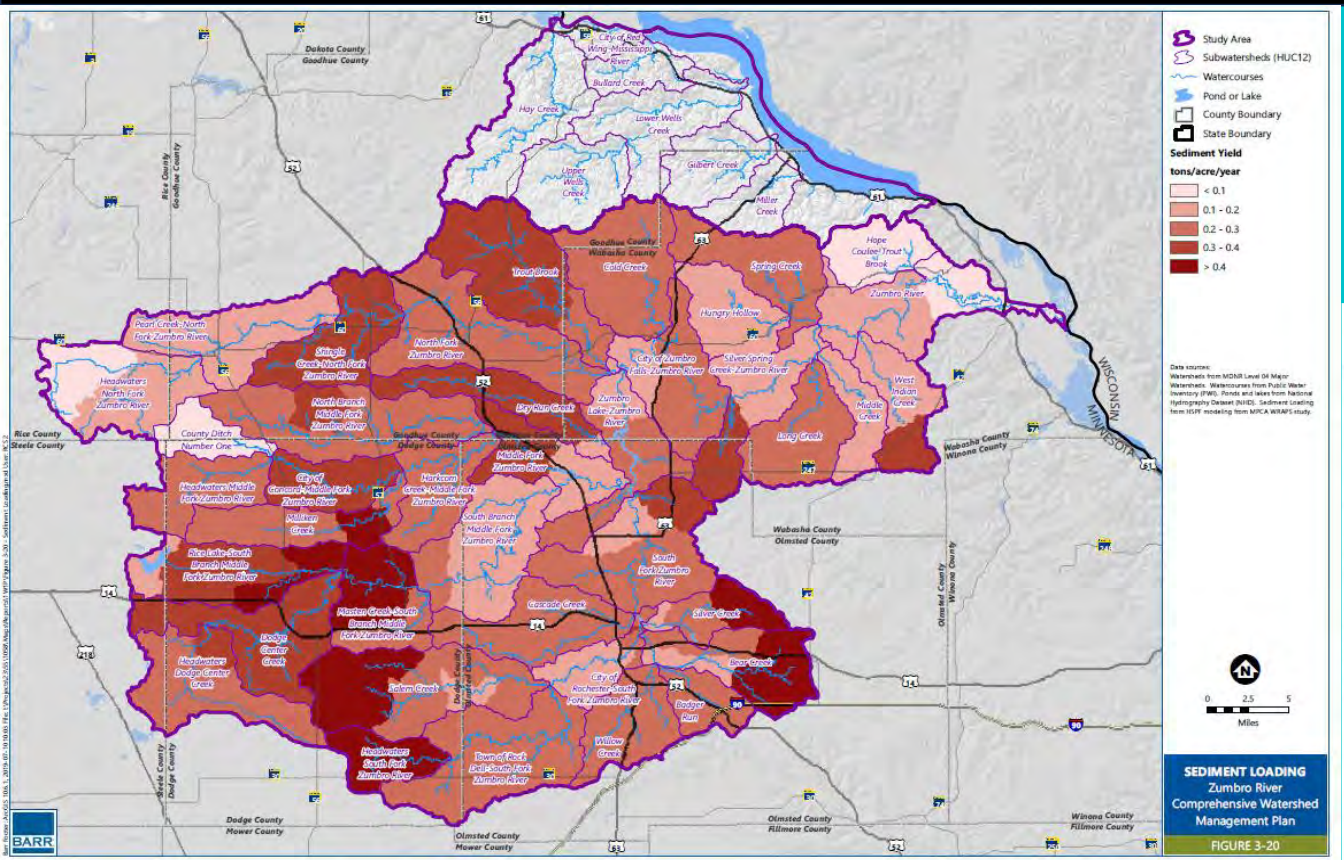
WATERSHED PARTNERSHIP

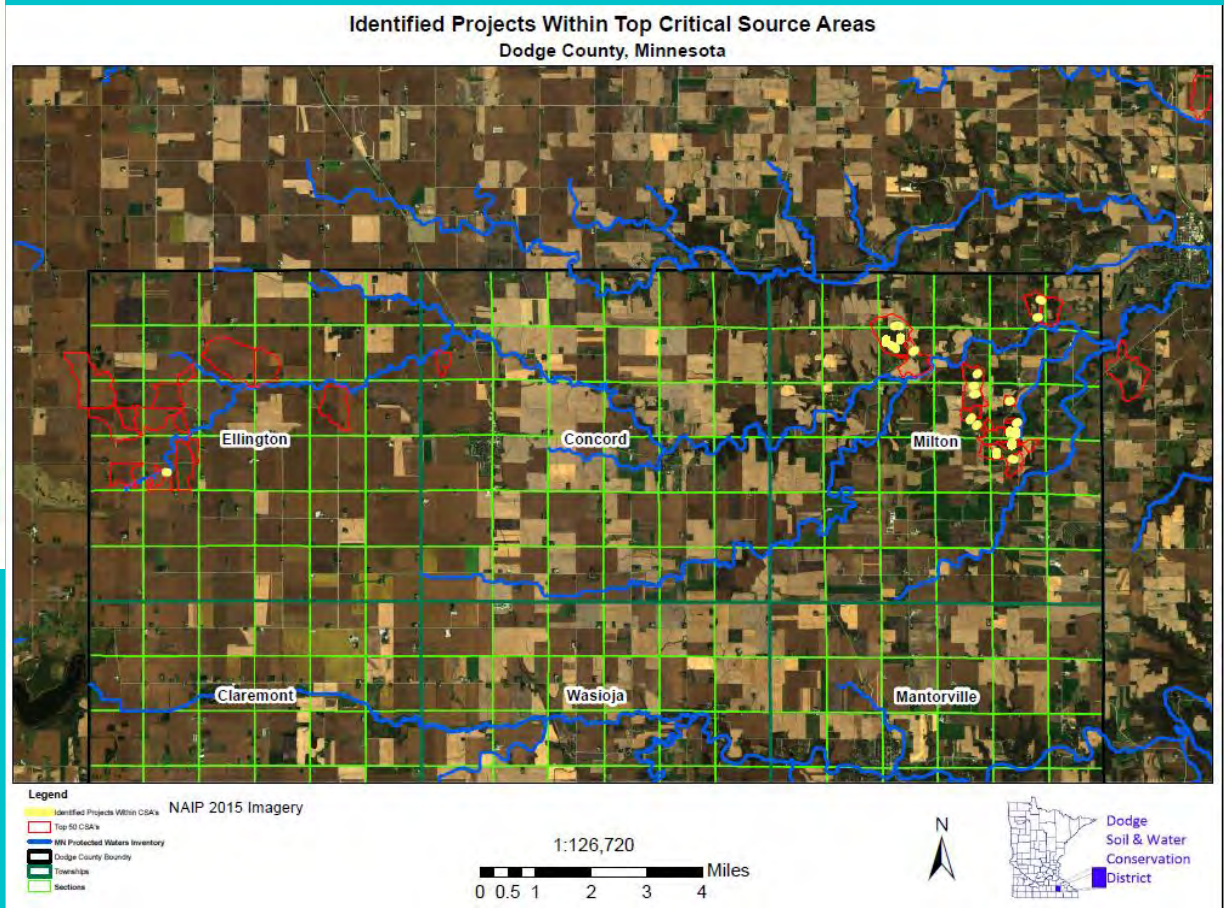
www.zumbrowatershed.org

Leadership for Midwestern Watersheds



Leadership for Midwestern Watersheds





Questions?