

Rocky Flats Coalition of Local Governments Board Meeting Minutes
Monday, September 13, 2004
8:30 a.m. – 12:00 p.m.
Mt. Evans Room in the Terminal Building
Jefferson County Airport, Broomfield

Board members in attendance: Gary Brosz (Director, Broomfield), Lori Cox (Alternate, Broomfield), Lorraine Anderson (Director, Arvada), Clark Johnson (Alternate, Arvada), Jane Uitti (Alternate, Boulder County), Sam Dixon (Director, Westminster), Jo Ann Price (Alternate, Westminster), Ron Hellbusch (Alternative, Westminster), Nanette Neelan (Alternate, Jefferson County), Karen Imbierowicz (Director, Superior), Devin Granbery (Alternate, Superior), Shaun McGrath (Director, City of Boulder), Hank Stovall (*ex-officio*), Lisa Morzel (*ex-officio*).

Coalition staff members and consultants in attendance: David Abelson (Executive Director), Kimberly Lohr (Assistant Director), Rik Getty (Technical Program Manager), Joan Fritsche (Seter & Vander Wall, P.C.).

Members of the Public: Dave Shelton (Kaiser-Hill), John Corsi (Kaiser-Hill), Lee Norland (Kaiser-Hill), Bob Nininger (Kaiser-Hill), Bob Fiehweg (STR), Joe Legare (DOE), Scott Surovchak (DOE), Karen Lutz (DOE), Frazer Lockhart (DOE), Laurie Shannon (USFWS), Mark Sattelberg (USFWS), Mark Aguilar (EPA), Rob Henneke (EPA), Steve Gunderson (CDPHE), Shirley Garcia (Broomfield), Al Nelson (Westminster), Bob Nelson (Golden), Patricia Rice (RFCAB), Ken Korkia (RFCAB), Victor Holm (RFCAB), Gerald DePoorter (RFCAB), Andrew Tirman (RMPJC), Erin Hamby (RMPJC), Doug Young (Rep. Udall), Danielle DeVere (Rep. Beauprez), Roman Kohler (Rocky Flats Homesteaders), Earl Gunia (citizen), Anne Fenerty (citizen), Hildegard Hix (citizen), Alisha Jeter (Broomfield Enterprise).

Convene/Agenda Review

Chairwoman Karen Imbierowicz convened the meeting at 8:35 a.m.

Business Items

1) Motion to Approve Consent Agenda – Gary Brosz motioned to approve the consent agenda. Lorraine Anderson seconded the motion. The motion passed 5-0 (Boulder County and Jefferson County were not yet present).

2) Executive Director's Report - David Abelson reported on the following items, several of which he discussed while in Washington, D.C. last week.

- The Rocky Flats orphan waste that was to be shipped to Hanford was put on hold due to pending court proceedings in Washington. However, DOE is now planning on shipping all remaining orphan waste to WCS, a private facility in Texas, for storage and/or

treatment. Shipments to Texas are expected to be completed over the next couple of months.

- The MOU between DOE and USFWS is at a standstill at headquarters. However, as explained by Frazer Lockhart at the Quarterly Stakeholder meeting, many MOU issues are being worked on locally. David asked for a summary paper describing the topics included in the MOU and decisions that have been or still need to be made so stakeholders can also start reviewing issues of local interest. David said Paul Golan and Doug Flanders are amenable to providing this type of information to stakeholders.
- FY05 funding for the Coalition remains unresolved. Senator Allard authorized funding for LSOs in FY05 with the intention that the Coalition would receive \$250,000, but it is still unclear whether or not Congress will pass the energy and water appropriations bill or continue funding at the prior year's levels via a continuing resolution. Thus, it is unclear if the Coalition will receive funding as a CRO, an LSO, or not at all. It is likely the appropriations bill will not be taken up until after the elections.
- At the August Board meeting Chuck Miller raised the issue of workers not getting full benefits due to early closure. Senator Allard added language to the defense authorization bill requiring DOE to report to Congress with an analysis of this issue, including the number of workers affected and the cost.
- There has been a fair amount of press over issues raised by the Rocky Flats Grand Jurors. DOE's response to their report was included in the Board packet, and the juror's response to DOE's response was also provided to the Board.
- David circulated an ad from the Capital Hill paper, Roll Call, regarding first responders. He noted some of the members listed were local communities and Rocky Flats, thus he thought it might be of interest to the Board.

Rik Getty provided a brief summary of elevated plutonium levels recently confirmed in surface water onsite. As reported at the July Board meeting, monitoring station O-93 had elevated readings in April, with a high of 0.36 pCi/L, which then continued into May and June along with rain and remediation activities, peaking at 2.2 pCi/L on June 22. The Site instituted enhanced erosion controls and values went down. The Site also conducted further investigation along the drainages that supply water to O-93 and tracked the source to gaging station 32, likely stemming from work at Building 779 and original process waste line remediation. Values at GS-32 were up to 250 pCi/L and 450 pCi/g for suspendable solids from soil erosion.

There was also an event at SW-027, the point of evaluation before the South Interceptor Ditch empties into Pond C-2, ranging from 0.16 to 3.4 pCi/L during June. This area is down slope from remediation at the 903 Pad outer lip area. The Site is investigating drainage stations to determine the source. David added the Site will report back at the November Board meeting on their findings and steps being taken to prevent similar situations occurring again.

Shaun McGrath asked about current action being taken, and Rik said DOE is going to characterize the area to see if the soil contamination spread out, and if the levels are within the action level of 50 pCi/g for surface soils. Lorraine Anderson asked what would trigger a cleanup

of these soils. David noted that when the radionuclide soil action levels were set it was known that there could still be areas where this standard would not be protective surface water. Second, when the Coalition agreed with changing the onsite water standard from 30-day to annual, it maintained that if a reading over 0.15 pCi/L occurred over a 30-day rolling average then investigations must be made into the source. Thus, the Site is first looking into the reason for the elevated readings and will then determine what needs to be done. Lorraine asked about these waters being retained onsite, and David said the water is held in the terminal ponds prior to release for this very reason. Lorraine also asked about removal of silt from these ponds, and David replied that some sediments will be removed prior to closure, but this is also a long-term activity that will require monitoring post-closure.

Public Comment

Doug Young (Rep. Udall) distributed a letter from Senator Allard and Reps. Udall and Beauprez to Doug Benevento (CDPHE) requesting a response to the issues raised in the Grand Jurors report.

Erin Hamby (RMPJC) said she spoke about the LSO language with citizen groups from the Mound and Fernald sites last week. They all agree that it is imperative that communities around closure sites be included from the beginning in discussions of what the LSO will look like and who will be invited to participate. Thus, there must be explicit inclusion of the community in any LSO language that goes to the Senate for discussion. She also spoke with Seth Tuler from the George Perkins Marsh Institute at Clark University and consultant to the National Academy of Science Committee on Public Participation, and he stressed that if a community stakeholder organization does not include community members from the beginning it will lose legitimacy in the end.

Anne Fenerty asked the Coalition to find out the real reason for the lack of an MOU between DOE and USFWS. She said mineral rights are said to be the issue, with an estimated cost of about \$20 million, which is less than five percent of the \$560 million possible bonus to be paid to Kaiser-Hill for early closure. She also asked why the Coalition is working on verification issues without knowing the extent of the refuge area, institutional and administrative controls planned for the Site, and responsibilities assumed by DOE and USFWS respectively. Additionally, Anne noted that the majority of the public at the three USFWS hearings she attended opposed public recreation at the Site. Thus, she asked why allowing recreation is a Coalition choice. She stated the planned developments around the Site should not result in a predetermined outcome of the independent verification, and she is concerned that after five meetings the Coalition committee charged with this process has yet to determine its purpose and scope.

Plutonium Hotspot in Buffer Zone

Lee Norland (Kaiser-Hill) provided an update on the elevated soil sample reading in the northern Buffer Zone. He first explained the sampling process as approved through the risk assessment

working group, which was explained in detail at the May Board meeting. Lee stated that the results of the Buffer Zone sampling, received in March, came back around background levels as expected with the exception of one grid cell that surprised them. Cell K-14, south of Highway 128 and in the lower reaches of the Rock Creek drainage, had a plutonium reading of 7.25 pCi/g. As part of the validation process, the Site then called the lab and asked them to reanalyze the remaining soil sample, and that result was 2.56 pCi/g. Lee stated there is no historical record of an event in that area.

Lee then explained that since the result is considered out of the ordinary for that area the Site sent a crew back on August 23 to resample. At that time they took discreet individual samples from each of the five locations in the grid cell to determine if the elevated reading came from one or multiple quadrants. Once results are received back this week they will determine their next course of action. Lee distributed a map showing the data from Buffer Zone surface soil sampling around that cell. Rik Getty also advised the Board that environmental samples are not very homogenous especially when composited, and it is normal to have variation.

Gary Brosz then asked questions about the lab analysis process. Lee said a 125-ml sample is sent to the lab and part of it is destroyed during a six-day acid digestion process. The result is one data point, not an average. When resampling, the lab follows the same process. Hank asked why they did not also retest the americium reading to validate the ratio. Lee said the first ratio was fairly close and they decided that if the plutonium result was strange then the americium result would be too.

Jane Uitti said Boulder County is concerned over the level of this reading since it is within Boulder County and could also affect the Colton trail immediately to the north. She wanted to know what sampling could be done to assure the public the trail is safe. Lee explained how the grids were divided and stated they would first need to understand the results from discreet sampling before following the lead for further sampling. He also noted that EPA would be doing oversight sampling in the area within the week and Mark Aguilar (EPA) confirmed they would be sampling at those same locations and described their chain of custody procedures. The EPA samples would go to an EPA lab.

Gary asked if the sample came from a drainage bottom. Lee explained that the Site differentiates between sediments and surface soils in their sample plans, and this is a surface soil sample. Sediments are also part of the risk assessment data adequacy review.

Shaun McGrath noted that five months had transpired between the time they received their first results back in March and when they took the discreet samples in August. He asked if there is any protocol for responding when an unexpected level is found. Lee clarified that this sample result is not an exceedance of any action levels, but is an exceedance of background levels. He then described their agreement with the labs and how the schedule of rates is based on turnaround time. There is also instrument limitations and most of the time it takes 21 days for an alpha spectrometry, although the longer you count the lower you can detect. Lee also described their paperwork process and said they had planned to bundle the resampling with other data

adequacy work, but had a crew free on August 23rd so sent them to do the work then. He stated the resampling was important, but not urgent. When Lee receives the unvalidated results from the discreet sampling he will forward them to Coalition staff.

Restricting Access to DOE-Retained Lands

David Abelson began the Board discussion on access restrictions by reviewing the following premises and open issues:

1. Restrict access to DOE-retained lands
 - Open issue: Coalition members may disagree on robustness of restriction(s)
2. Protect areas within DOE-retained lands with additional controls and protect monitoring stations on USFWS lands
 - Open issue: Coalition needs additional information on areas that will require additional controls - details still under discussion (e.g. monitoring stations, B371, landfills, etc.)
3. Layer physical and institutional controls (fences, signs, legal restrictions, etc.)
 - Open issue: Do not know whether there is an open issue at the Coalition level but do know there are/will be substantive discussion in other venues
4. Monitor to know if problems arise
 - Note: Separate but related issue - discussion taking place in various venues

David then showed slides illustrating examples of access restrictions proposed for Rocky Mountain Arsenal consisting of a four-strand cattle fence, assorted signs and obelisks.

Lisa Morzel referred to layering controls and said it would be helpful to start a list of high areas of concern that would require such controls, and Jane Uitti suggested DOE provide a weighted list of areas where it would be critical to keep people out. David said addressing this issue may be difficult right now since there are not final decisions on some of these areas, including legal post-closure issues. Shaun McGrath said he is not sure delineating these types of areas is a good idea as it could open up the Industrial Area (IA) for access. David clarified that nobody is suggesting public access to the IA, but instead how to create additional layers of protection within the DOE-retained lands. Lorraine Anderson liked Jane's suggestion as she would like to better understand what is there and how it should be protected.

Sam Dixion said there is no question that the IA will not be accessible by the public, but a minimal fence around the IA may keep people out minimally. She added that a fence of any kind will keep most people out the first few years, which is how long she hopes it takes USFWS to open the refuge to the public. Ron Hellbusch said it is important to keep people from the IA, but they should also do everything possible to maximize the value of the refuge. He added that refuge inhabitants will need to be able to move through the refuge and structures should be designed with wildlife in mind while maximizing aesthetics.

Karen Imbierowicz asked David to review where each government stood in terms of the robustness of an IA fence. David stated that Superior, Jefferson County, Broomfield, Arvada,

and possibly Westminster held the position that a cattle fence with signage around the area would be appropriate. Conversely, Boulder County and the City of Boulder have stated their preference for a more robust fence, along the lines of a 10-foot chain-link fence, in order to prevent vandalism. Nanette Neelan said Jefferson County referred to minimal fencing around the entire refuge in their letter to USFWS. David explained he was referring to statements made during the June Board discussion. Lorraine said fencing around the IA is open for discussion for Arvada, and that she likes the wildlife fences on highway US-40 over Berthoud Pass. She noted that she is not sure how a fence would keep burrowing animals out. Lisa said the City of Boulder has invested in some deep fences to control prairie dogs. Hank Stovall said he personally would expect to see some type of four-strand fence to allow wildlife passage, especially since the area is within the risk range for a wildlife worker and hence visitors and the animals present (although prairie dogs that enter should be eradicated). However, he said they still need to understand the level of enforcement. Sam agreed wildlife should be able to negotiate the IA fence, but she is concerned about the ponds and monitoring areas; she differentiated between fences to keep people safe vs. to keep property safe.

Joe Legare (DOE) summarized what he heard from the Board and appreciated Ron's statement regarding maximizing the benefit of the refuge while ensuring public safety. He stated that Sam raised a different issue over whether the cleanup is protective and how to protect against future events. He said DOE supports a prairie fence as a way to demarcate between the IA and the refuge while allowing wildlife to pass without disrupting the visual aspect, and that they believe they are protecting the remedy from people and not the other way around. He said he is anxious to continue the dialogue, either with the Board or Stewardship Working Group, and answer the good questions raised about areas that will require protection and different levels of control. Joe noted that they can begin working out some of these details, but it will still be dependent upon final remedies and total site characterization.

Shaun said he does not believe a prairie fence will keep people out of the IA, and he believes prohibition of people must take precedent over wildlife management in refuge policy. He also said they should know the USFWS policy regarding public access to the refuge in general before having this discussion. Doug Young (Rep. Udall) said he helped draft the refuge bill, and the intention of the refuge bill was to allow access to the entire site as it would be cleaned to safe levels for workers and visitors. Now he sees a huge area in the center of the Site being blocked off, and he asked the basis for the concern over safety. David explained that DOE decided it would make more sense to manage one area instead of several small areas, along with the general idea of keeping people away from the remedies, and the Board did not challenge this decision. Karen added that when the bill passed the cleanup decisions were also different, and they now are more risk-based allowing higher levels of contamination in the subsurface. Sam said she feels the area is not clean, and that although cleaned to risk levels on the surface, erosion over time is a factor. Lorraine disagreed with Sam and said she does not believe the cleanup was changed from clean to dirty. Karen clarified that she said the cleanup level is "different", not going as deep, and although some areas such as the surface will be cleaner, that does not mean that over time they should not still keep people out. Lisa appreciated Hank's comment on

enforcement and said they should know what type of enforcement will be needed to ensure hotspots are protected and not approached.

Lorraine asked the regulators how hot is “hot”. Steve Gunderson (CDPHE) voiced his distress over the direction of the Board conversation and then described his confidence in cleanup efforts. He noted there would be residual contamination, but DOE-Legacy Management will have a presence, along with the State, and perhaps even the Local Stakeholder Organization. Steve added that all Superfund sites in the state share similar control issues. He said he was not happy about the surface water exceedances, but to keep in mind that the cleanup is not complete yet and there is a lot of work still to be done. Mark Aguilar agreed with him and said whatever action USFWS chooses for the refuge can be done and keep visitors safe. Joe emphasized that there are not two cleanup levels, and that it is a USFWS management issue in choosing not to allow public access to the IA. Shaun said they must consider the safety of the Site into perpetuity. Lorraine, Gary Brosz, and Hank all confirmed their belief in the safety of the cleanup.

Formation of Local Stakeholder Organization

David Abelson first provided background information on the Senate language in the National Defense Authorization Act (NDAA) that calls for the creation of Local Stakeholder Organizations (LSO) at closure sites. He stated that the question the Board has been discussing is not whether to involve non-elected officials, but rather how to involve them. He noted that the Coalition invited the Rocky Flats Citizens Advisory Board (CAB) to sit at the table during this discussion for this very reason, just as he had met with them at their meeting. However, the CAB decided not to, although several members were in the audience.

David next provided a timeline which illustrates how LSO planning will coincide with the Coalition budget and strategic planning process at the end of 2004. Another noteworthy date is August 31, 2005, when the Coalition’s office lease is up, Coalition staff will likely be reduced, and closure by December 2005 is imminent. Thus, primary planning for the LSO should focus on how to get from today to January 2006, allowing for flexibility past August 2005. David said Frazer Lockhart suggested the LSO core and framework should be established by next spring.

David then outlined the following primary issues to be addressed in forming the LSO:

1) Potential purpose of organization:

- To provide continuing local oversight of activities occurring at the Rocky Flats site, ensuring that local and community interests are met with regards to long-term stewardship of residual contamination and refuge management
- This purpose would also help meet the overarching purpose, which is to help DOE accomplish its post-closure mission

2) Potential objectives/interests:

- To provide a forum for elected officials and community members to discuss with federal, state, and local elected officials and agencies issues related to the long-term stewardship and management of the Rocky Flats site

- To provide a forum for elected officials and community members to be briefed on the results of the operational and performance monitoring data of site operations
- To provide a mechanism for keeping elected officials and community members informed of the results of the monitoring data
- To provide a mechanism for educating succeeding generations about the residual hazards and the continued need for a comprehensive site-wide stewardship program
- To provide a forum for United States Fish and Wildlife Service staff to work with elected officials and community members on issues related to the management of resources under that agency's jurisdiction

3) *Potential responsibilities/scope of work:* [note: if the LSO is formed prior to regulatory closure, part of its scope will be engaging on such issues]

- Provide recommendations on final regulatory documents, including
 - CAD/ROD
 - delisting/EPA certification
 - Post-closure RFCA
- Evaluate legal and regulatory issues regarding implementation of site-wide long-term stewardship plan
- Analyze technical data regarding implementation and effectiveness of cleanup remedies and long-term controls
- Disseminate information
- Provide opportunities for community education
- Provide interface and communicate with federal, state, and local elected officials and agencies
- Provide recommendations on refuge management
- Consider how to potentially incorporate museum functions by converging both organizations

4) *Potential Board composition, including role of non-elected officials and DOE/regulators:*

- Elected officials
- Community members representing broad array of interests, including refuge management (e.g., current members of the CAB, Audubon, The Nature Conservancy, etc.)
- Ex-officio members, such as representatives from the state and federal agencies

Karen Imbierowicz and Gary Brosz both stated this outline is a good start. Hank Stovall said the LSO should also be a champion for former workers' issues. Shaun McGrath stated the objective of providing a mechanism for educating future generations should also be listed under "purpose". Ron Hellbusch asked if LSO funding will be an issue at some point in the future. David reviewed the process of funding authorization and appropriations. Frazer Lockhart said the NDAA authorizes funds, but April and May are significant times for appropriations thus his suggestion that the LSO have a clear scope by next spring. Ron said funding could also determine what the organization looks like. David responded that he has been discussing with Frazer what has to happen post-closure, which will also drive the specific role and scope of work. Shaun asked if the LSO would be funded with annual appropriations once it is established, and David replied that is most likely. Shaun suggested adding the issue of funding

to the scope of work. Jo Ann Price asked how long the LSO is expected to continue, and David said the Senate language is open ended with no timeline established. He added that as more sites reach closure there would be more LSOs and Legacy Management would be a growing program office in DOE.

The Board then discussed the issue of the CAB choosing not to join in the Coalition discussion. Victor Holm thanked the Board for inviting them and said it will take a number of conversations to form the LSO, and also explained that the CAB is an Environmental Management Advisory Board and not under Legacy Management so he felt it inappropriate for the CAB as an entity to negotiate over the future composition of the Coalition Board. He also said that at the CAB public participation workshop in July he heard a real desire for broad public input, not just local governments. Victor suggested the Stewardship Working Group as an ideal vehicle to hammer out details over LSO composition. Erin Hamby stated it is extremely important the discussion about Board composition be broad and include members of the community. She said the LSO legislation affects Mound and Fernald as well, and there is no local government representation at those sites. Erin also said the way in which the Coalition is set up does not allow community members to have an active voice, and although the Board listens, community members do not have a vote. She said until the public is really involved in the entire LSO discussion legitimacy will be lost, and it matters that the LSO is being perceived as a continuation of the Coalition since the community is not involved in local governments. David agreed Fernald does not have local government involvement, but said Mound does.

Lorraine Anderson voiced concern over the idea that somehow local governments are not representative of their communities. She stated local government is elected by the majority of the community and then works to represent the broad local community, but activist groups by their very nature represent a small faction of the community. Lorraine also disagreed with the CAB's proposed LSO language which states the LSO community members should be appointed by the Secretary of Energy as she believes the Secretary is too far removed from the local issues. Shaun McGrath agreed with Lorraine about the LSO language, and said he was happy to see the CAB at the meeting but disappointed they were not at the table to brainstorm over how to create a future entity. He said it is important to have non-elected members as part of the organization and asked the CAB to work with the Coalition and discuss how it could work. Gary said local elected officials are in the position of being part of the general community without a preconceived agenda, and the Coalition brings in all points of view and expertise before making recommendations.

Victor said the broad perception in the community is that government does not necessarily represent the entire views of the community. Earle Gunia said there is no question that local governments represent their communities, but there is still the perception that two organizations are trying to dictate what the LSO will look like, but other organizations also want to be involved, and everyone should have equal input. The Board continued to discuss this issue, including: the impossibility of representing 100% of the population's views; the private interests and agendas that crept into the Rocky Flats Local Impact Initiative; public safety; listening to activist groups; and, using the best science to come to a conclusion. Lorraine said how the

organization goes about selecting community members to serve on the Board should be the point of the discussion, and suggested appointment by local governments or an application and interview process requiring approval by the entire Board. Karen reminded the CAB that the Coalition did not write the LSO language. Hank said regulators could serve as *ex-officio* members, and he also warned that if the Board was too large or required consensus it would become unwieldy and ineffective. Lisa Morzel said she would forward a charter from an overseer group she sits on for the group to consider as a possible model.

In outlining future steps, David asked the CAB and community groups to offer their input on the first three primary issues he spoke of earlier. As for LSO composition, he stated the Coalition Board made the commitment that non-elected members will be involved and they will have to work through the issues of what it means to be on the Board along with voting and legal issues. However, working out the details of purpose, objects, and scope of work should be the first priority. Victor said the CAB wants to be part of this process. David added that when he met with Senator Allard's staff they made it clear that there would be no changes in the report language.

Public Comment

As a fellow elected official, Bob Nelson (Golden) agreed with the Board that he does represent the people of his community. He also said he agreed with Steve Gunderson on the safety of the cleanup.

Ken Korkia (RFCAB) said the members of the RFCAB do not deny that elected officials represent the community, but offer instead that they are not the only representatives of the community. He said he believes that RFLII represented a broad section of the community and did a good job of bringing all the interests together, and likewise the LSO should allow all members equal input in order to maintain long-term interest in Rocky Flats.

Updates/Big Picture Review

The meeting was running overtime, so this discussion was abbreviated to an update from the independent review committee. Hank Stovall said the group had met five times and is continuing to address issues of surface soil, groundwater, and the idea of independence. He said DOE is considering the possibility of doing validation of their soil sampling plan through ORISE, a consortium of universities. ORISE met with the Site and Hank, along with members from Broomfield and Coalition staff. Hank said issues to consider are whether ORISE would be considered independent, and the extent the Coalition would be involved in determining the scope of work. In reference to groundwater, Hank said they are still determining which processes could be peer reviewed. He said he is optimistic the group will have a recommendation ready within the next week or so. David said time is scheduled to discuss progress and recommendations at the October Board meeting.

David said the Board will need to take up the conversation addressing ex-officio appointments in November, and Nanette Neelan asked that review of the final refuge CCP/EIS be added to the December meeting.

Shaun McGrath then raised the issue of surface soil exceedances. David explained that the radionuclide soil action level for the entire surface of the Site is 50 pCi/g for plutonium, but the State and DOE reached agreement that anything over 7 pCi/g would be retained by DOE. However, 7 pCi/g is not a standard. The Board then discussed issues of sampling protocol, analysis techniques, identifying the contamination source, investigation methods, contractor scope of work, background levels and Buffer Zone contamination levels.

The meeting was adjourned by Karen Imbierowicz at 11:58 a.m.

Respectfully submitted by Kimberly Lohr, Assistant Director