

CASES 906-S-18 and 907-S-18

SUPPLEMENTAL MEMORANDUM #3

October 25, 2018

Petitioners: **FFP IL Community Solar LLC, 100 Montgomery Street, Suite 725, San Francisco, CA 94104, via agent David Dickson, and participating landowners the Woodard Family Trust**

Case 906-S-18 (Woodard's St. Joseph - WEST)

Request: Authorize a Community PV Solar Farm with a total nameplate capacity of 2 megawatts (MW), including access road and wiring, in the AG-1 Agriculture Zoning District, and including the following waivers of standard conditions:

Part A: A waiver for a distance of 135 feet from the CR Conservation Recreation Zoning District in lieu of the minimum required one-half mile (2,640 feet), per Section 6.1.5 B.(2)b.

Part B: Not providing a Decommissioning and Site Reclamation Plan that includes cost estimates prepared by an Illinois Licensed Professional Engineer prior to consideration of the Special Use Permit by the Board, per Section 6.1.1 A.3.

Location: A 40-acre tract in the Northeast Quarter of the Southeast Quarter of Section 3 of Township 19 North, Range 10 East of the Third Principal Meridian in St. Joseph Township, and commonly known as the farmland approximately 600 feet north of Schuren Nursery on the west side of CR 2200E.

Case 907-S-18 (Woodard's St. Joseph - EAST)

Request: Authorize a Community PV Solar Farm with a total nameplate capacity of 2 megawatts (MW), including access road and wiring, in the AG-1 Agriculture Zoning District, and including the following waivers of standard conditions:

Part A: A waiver for a distance of 338 feet in lieu of one-half mile (2,640 feet) between a municipal boundary and a PV SOLAR FARM, per Section 6.1.5 B.(2) of the Zoning Ordinance.

Part B: A waiver for locating a PV SOLAR FARM within the Contiguous Urban Growth Area (CUGA) in lieu of outside the CUGA, per Section 6.1.5 B.(2) of the Zoning Ordinance.

Part C: Not providing a Decommissioning and Site Reclamation Plan that includes cost estimates prepared by an Illinois Licensed Professional Engineer prior to consideration of the Special Use Permit by the Board, per Section 6.1.1 A.3.

Part D: Not entering into a Roadway Upgrade and Maintenance Agreement or waiver therefrom with the relevant local highway authority prior to consideration of the Special Use Permit by the Board, per Section 6.1.5 G.

Location: A 153.23-acre tract in the Northwest Quarter of Section 12 of Township 19 North, Range 10 East of the Third Principal Meridian in St. Joseph Township, and commonly known as the farmland at the southwest corner of CR 2350E and CR 1700N.

Time Schedule for Development: **As soon as possible**

Prepared by: **Susan Burgstrom**
Senior Planner

John Hall
Zoning Administrator

STATUS

The following is a summary of testimony from the October 18, 2018 ZBA public meeting that will be added under Item 8.I.(4) of the Summary of Evidence dated October 18, 2018. Evidence will be added to Case 906, 907, or both Summaries of Evidence as appropriate. An email and letter from Bob Glasa will be added as Item 8.I.(5) and is Attachment A to this memo.

- (4) The following testimony was received at the October 18, 2018 ZBA meeting:
- a. In cross-examination of the petitioner's team, the following questions were asked:
 - (a) Bob Glasa asked the following:
 - i. Mr. Glasa was confused by the address used for the proposed solar farm because it was the same as Mr. Glasa's address.
 - ii. He asked if the NEC Code required the use of barbed wire.
 - iii. He asked how the 240 feet between his property and the proposed solar farm would be landscaped.
 - iv. He confirmed with Mr. Jason Grissom that the petitioner is amenable to talking to him in the future about his landscaping preferences.
 - v. He asked what the decibel value was at the property line.
 - vi. He verified with Mr. Grissom that the petitioner would have high-speed internet at the site.
 - (b) Wally Worley asked the following:
 - i. Had Mr. Grissom been on the proposed site?
 - ii. Mr. Worley confirmed with Mr. Jason Grissom that the petitioner is amenable to talking to him in the future about his preferences for a landscape screen.
 - (c) David Jones asked about the types of grasses proposed for landscaping.
 - (d) Becky Smith asked the following:
 - i. Ms. Smith asked how tall would the plants be for the screening when planted and how long would it take for the plants to provide actual screening?
 - ii. She asked if the solar farm be visible from the road?
 - iii. She asked if the solar farm would only be mowed once every 3 months?
 - iv. She asked how large the name placard would be for the solar farm?
 - v. She asked about the impact of flooding on the solar farm and what would happen if the solar panels needed to be raised due to flooding?

- b. Testimony can be summarized as follows:
 1. A letter was received from David & Sandra Barcus. They encouraged the Board to uphold the Solar Farm Ordinance adopted on August 23, 2018, in full. They believe the Ordinance was written to make sure the residents of Champaign County were provided with some protection and consideration. They believe that if the property in question is not suitable for solar farm use with the complete Ordinance in place, the petitioner should look for a more suitable property to fit their needs and still be in compliance with the Solar Farm Ordinance of Champaign County. They asked if the Village of St. Joseph Zoning Board has any jurisdiction over this matter.
 2. Bob Glasa, who lives at 1753 CR2200E, St. Joseph, testified for Case 906-S-18 as follows:
 - a. Mr. Glasa would like to be able to provide comments on the proposed landscape screening when it is finally proposed.
 3. Tami Fruhling-Voges, Mayor of the Village of St. Joseph, who lives at 407 North Third Street in St. Joseph, testified as follows regarding both Cases 906-S-18 and 907-S-18:
 - a. She would appreciate more and better communications with solar farm petitioners within one and one-half miles of the Village.
 - b. She said that she would like to see a buffer on all sides of a solar farm within one and one-half miles of the Village.
 - c. She said that the Village considers the flood zone to be more suitable for a conservation area because any kind of obstruction to flooding will be a problem.
 - d. She would appreciate if the Village had more of a voice in what kind of development is approved by the County within one and one-half miles of the Village.
 4. Paul Swinford, who lives at 1750 CR2200E, St. Joseph, testified as follows:
 - a. Mr. Swinford has worked in engineering for years and he does not understand why you would put a solar farm in a corn field. He believes a brown field is a better site for a solar farm and he recommend the abandoned rail line between St. Joseph and Urbana.
 5. David Jones, who lives at 1752 CR2200E, St. Joseph, testified for Case 906-S-18 as follows:
 - a. Mr. Jones was concerned about the height of floodwaters at the proposed location and how that might impact the solar farm.
 - b. Upon cross examination Mr. Jones stated that he had seen CR2200E nearly underwater at times.
 6. Wally Worley, who lives at 2160 CR1700N, St. Joseph, testified for Case 906-S-18 as follows:
 - a. Mr. Worley said that he has put a lot of time and money into his property and he spends a great deal of time in his yard and he did not

- want to see the proposed solar farm and he requested that a screen be required on the west side of the proposed solar farm.
- b. He asked how much of the project was flat (impervious) surface?
 - c. He asked how much of the proposed solar farm is funded from taxes?
 - d. He asked if any wildlife studies had been done to identify harm to wildlife?
 - e. He asked if the proposed solar farm would produce the “lake effect” phenomenon that is harmful to birds?
- (5) Bob Glasa submitted an email with attached letter received October 19, 2018, which was also sent to Jason Grissom, Development Project Manager with Forefront Power. His comments regarding Case 906-S-18 included concerns about barbed wire fencing and visual screening.

SPECIAL CONDITIONS FOR CASE 906-S-18:
REVISED CONDITION A AND NEW CONDITION F

- A. **The Site Plan received October 11, 2018, is the approved site plan for Case 906-S-18, except that vegetative screening shall be added to the west and south sides of the solar farm in addition to the screening shown on the October 11, 2018 Site Plan.**

The above special condition is required to ensure that:

The constructed PV SOLAR FARM is consistent with the special use permit approval and considers the needs of adjacent residents.

- B. **The Zoning Administrator shall not authorize a Zoning Use Permit Application or issue a Zoning Compliance Certificate on the subject property until the lighting specifications in Paragraph 6.1.2.A. of the Zoning Ordinance have been met.**

The special condition stated above is required to ensure the following:

That exterior lighting for the proposed Special Use meets the requirements established for Special Uses in the Zoning Ordinance.

- C. **The Zoning Administrator shall not issue a Zoning Compliance Certificate for the proposed PV SOLAR FARM until the petitioner has demonstrated that the proposed Special Use complies with the Illinois Accessibility Code, if necessary.**

The special condition stated above is required to ensure the following:

That the proposed Special Use meets applicable state requirements for accessibility.

- D. **The Zoning Administrator shall not authorize a Zoning Use Permit until the petitioner submits a copy of an executed Agricultural Impact Mitigation Agreement with the Illinois Department of Agriculture per the requirements established in Paragraph 6.1.5 R. of the Zoning Ordinance.**

The special condition stated above is required to ensure the following:

That the land affected by PV SOLAR FARM is restored to its pre-construction capabilities.

- E. **A signed Decommissioning and Site Reclamation Plan that has been approved by the Environment and Land Use Committee is required at the time of application for a Zoning Use Permit that complies with Section 6.1.1 A. and Section 6.1.5 Q. of the Zoning Ordinance, including a decommissioning cost estimate prepared by an Illinois Professional Engineer.**

The special condition stated above is required to ensure the following:

The Special Use Permit complies with Ordinance requirements and as authorized by waiver.

- F. **Vegetative screening on all sides of the solar farm, that has been approved by the Environment and Land Use Committee, is required at the time of application for a Zoning Use Permit that complies with Section 6.1.1 A. and Section 6.1.5 Q. of the Zoning Ordinance.**

The special condition stated above is required to ensure the following:

The Special Use Permit complies with Ordinance requirements and considers the needs of adjacent residents.

- G. **The following submittals are required prior to the approval of any Zoning Use Permit for a PV SOLAR FARM:**
1. **Documentation of the solar module's unlimited 10-year warranty and the 25-year limited power warranty.**
 2. **An irrevocable letter of credit to be drawn upon a federally insured financial institution with a minimum acceptable long term corporate debt (credit) rating of the proposed financial institution shall be a rating of "A" by S&P or a rating of "A2" by Moody's within 200 miles of Urbana or reasonable anticipated travel costs shall be added to the amount of the letter of credit.**
 3. **A permanent soil erosion and sedimentation plan for the PV SOLAR FARM including any access road that conforms to the relevant Natural Resources Conservation Service guidelines and that is prepared by an Illinois Licensed Professional Engineer.**
 4. **Documentation regarding the seed to be used for the pollinator planting, per 6.1.5 F.(9).**
 5. **The telephone number for the complaint hotline required by 6.1.5 S.**
 6. **Any updates to the approved Site Plan from Case 906-S-18 per the Site Plan requirements provided in Section 6.1.5 U.1.c.**
 7. **A copy of a certification from the Illinois State Historic Preservation Office indicating that the Phase 1 archaeological reconnaissance survey required in the letter from ISHPO to David Dickson dated May 30, 2018, for the development area is complete and requires no further action by the applicant.**

8. A Floodplain Development Permit Application and any required information for it in addition to the Zoning Use Permit Application.

The special conditions stated above are required to ensure the following:

The PV SOLAR FARM is constructed consistent with the Special Use Permit approval and in compliance with the Ordinance requirements.

H. A Zoning Compliance Certificate shall be required for the PV SOLAR FARM prior to going into commercial production of energy. Approval of a Zoning Compliance Certificate shall require the following:

- 1. An as-built site plan of the PV SOLAR FARM including structures, property lines (including identification of adjoining properties), as-built separations, public access road and turnout locations, substation(s), electrical cabling from the PV SOLAR FARM to the substations(s), and layout of all structures within the geographical boundaries of any applicable setback.**
- 2. As-built documentation of all permanent soil erosion and sedimentation improvements for all PV SOLAR FARM including any access road prepared by an Illinois Licensed Professional Engineer.**
- 3. An executed interconnection agreement with the appropriate electric utility as required by Section 6.1.5 B.(3)b.**

The special conditions stated above are required to ensure the following:

The PV SOLAR FARM is constructed consistent with the special use permit approval and in compliance with the Ordinance requirements.

I. The Applicant or Owner or Operator of the PV SOLAR FARM shall comply with the following specific requirements that apply even after the PV SOLAR FARM goes into commercial operation:

- 1. Maintain the pollinator plantings and required visual screening in perpetuity.**
- 2. Cooperate with local Fire Protection District to develop the District's emergency response plan as required by 6.1.5 H.(2).**
- 3. Cooperate fully with Champaign County and in resolving any noise complaints including reimbursing Champaign County any costs for the services of a qualified noise consultant pursuant to any proven violation of the I.P.C.B. noise regulations as required by 6.1.5 I.(4).**
- 4. Maintain a current general liability policy as required by 6.1.5 O.**
- 5. Submit annual summary of operation and maintenance reports to the Environment and Land Use Committee as required by 6.1.5 P.(1)a.**
- 6. Maintain compliance with the approved Decommissioning and Site Reclamation Plan including financial assurances.**

7. **Submit to the Zoning Administrator copies of all complaints to the telephone hotline on a monthly basis and take all necessary actions to resolve all legitimate complaints as required by 6.1.5 S.**

The special conditions stated above are required to ensure the following:

Future requirements are clearly identified for all successors of title, lessees, any operator and/or owner of the PV SOLAR FARM.

SPECIAL CONDITIONS FOR CASE 907-S-18: REVISED CONDITION A

- A. **The Site Plan received October 11, 2018, is the approved site plan for Case 907-S-18, except that vegetative screening shall be added to the west side of the solar farm in addition to the screening shown on the October 11, 2018 Site Plan.**

The above special condition is required to ensure that:

The constructed PV SOLAR FARM is consistent with the special use permit approval and considers potential future development adjacent to the solar farm.

- B. **The Zoning Administrator shall not authorize a Zoning Use Permit Application or issue a Zoning Compliance Certificate on the subject property until the lighting specifications in Paragraph 6.1.2.A. of the Zoning Ordinance have been met.**

The special condition stated above is required to ensure the following:

That exterior lighting for the proposed Special Use meets the requirements established for Special Uses in the Zoning Ordinance.

- C. **The Zoning Administrator shall not issue a Zoning Compliance Certificate for the proposed PV SOLAR FARM until the petitioner has demonstrated that the proposed Special Use complies with the Illinois Accessibility Code, if necessary.**

The special condition stated above is necessary to ensure the following:

That the proposed Special Use meets applicable state requirements for accessibility.

- D. **The Zoning Administrator shall not authorize a Zoning Use Permit until the petitioner submits a copy of an executed Agricultural Impact Mitigation Agreement with the Illinois Department of Agriculture per the requirements established in Paragraph 6.1.5 R. of the Zoning Ordinance.**

The special condition stated above is required to ensure the following:

That the land affected by PV SOLAR FARM is restored to its pre-construction capabilities.

- E. **A signed Decommissioning and Site Reclamation Plan that has been approved by ELUC is required at the time of application for a Zoning Use Permit that complies with Section 6.1.1 A. and Section 6.1.5 Q. of the Zoning Ordinance, including a decommissioning cost estimate prepared by an Illinois Professional Engineer.**

The above special conditions are required to ensure that:

The Special Use Permit complies with Ordinance requirements and as authorized by waiver.

- F. **A Roadway Upgrade and Maintenance Agreement signed by the Highway Commissioner and approved by the Environment and Land Use Committee shall be submitted at the time of application for a Zoning Use Permit.**

The above special condition is necessary to ensure the following:

To ensure full compliance with the intent of the Zoning Ordinance in a timely manner that meets the needs of the applicant.

- G. **The following submittals are required prior to the approval of any Zoning Use Permit for a PV SOLAR FARM:**

1. **Documentation of the solar module's unlimited 10-year warranty and the 25-year limited power warranty.**
2. **An irrevocable letter of credit to be drawn upon a federally insured financial institution with a minimum acceptable long term corporate debt (credit) rating of the proposed financial institution shall be a rating of "A" by S&P or a rating of "A2" by Moody's within 200 miles of Urbana or reasonable anticipated travel costs shall be added to the amount of the letter of credit.**
3. **A permanent soil erosion and sedimentation plan for the PV SOLAR FARM including any access road that conforms to the relevant Natural Resources Conservation Service guidelines and that is prepared by an Illinois Licensed Professional Engineer.**
4. **Documentation regarding the seed to be used for the pollinator planting, per 6.1.5 F.(9).**
5. **A Transportation Impact Analysis provided by the applicant that is mutually acceptable to the Applicant and the County Engineer and State's Attorney; or Township Highway Commissioner; or municipality where relevant, as required by 6.1.5 G. 2.**
6. **The telephone number for the complaint hotline required by 6.1.5 S.**
7. **Any updates to the approved Site Plan from Case 907-S-18 per the Site Plan requirements provided in Section 6.1.5 U.1.c.**

The above special condition is required to ensure that:

The PV SOLAR FARM is constructed consistent with the Special Use Permit approval and in compliance with the Ordinance requirements.

- H. **A Zoning Compliance Certificate shall be required for the PV SOLAR FARM prior to going into commercial production of energy. Approval of a Zoning Compliance Certificate shall require the following:**

1. **An as-built site plan of the PV SOLAR FARM including structures, property lines (including identification of adjoining properties), as-built separations,**

public access road and turnout locations, substation(s), electrical cabling from the PV SOLAR FARM to the substations(s), and layout of all structures within the geographical boundaries of any applicable setback.

2. **As-built documentation of all permanent soil erosion and sedimentation improvements for all PV SOLAR FARM including any access road prepared by an Illinois Licensed Professional Engineer.**
3. **An executed interconnection agreement with the appropriate electric utility as required by Section 6.1.5 B.(3)b.**

The above special condition is required to ensure that:

The PV SOLAR FARM is constructed consistent with the special use permit approval and in compliance with the Ordinance requirements.

- I. **The Applicant or Owner or Operator of the PV SOLAR FARM shall comply with the following specific requirements that apply even after the PV SOLAR FARM goes into commercial operation:**
 1. **Maintain the pollinator plantings and required visual screening in perpetuity.**
 2. **Cooperate with local Fire Protection District to develop the District's emergency response plan as required by 6.1.5 H.(2).**
 3. **Cooperate fully with Champaign County and in resolving any noise complaints including reimbursing Champaign County any costs for the services of a qualified noise consultant pursuant to any proven violation of the I.P.C.B. noise regulations as required by 6.1.5 I.(4).**
 4. **Maintain a current general liability policy as required by 6.1.5 O.**
 5. **Submit annual summary of operation and maintenance reports to the Environment and Land Use Committee as required by 6.1.5 P.(1)a.**
 6. **Maintain compliance with the approved Decommissioning and Site Reclamation Plan including financial assurances.**
 7. **Submit to the Zoning Administrator copies of all complaints to the telephone hotline on a monthly basis and take all necessary actions to resolve all legitimate complaints as required by 6.1.5 S.**

The above special condition is required to ensure that:

Future requirements are clearly identified for all successors of title, lessees, any operator and/or owner of the PV SOLAR FARM.

ATTACHMENTS

- A Email with attached letter from Bob Glasa received October 19, 2018, which was also sent to Jason Grissom, Development Project Manager with Forefront Power

Susan Burgstrom

From: Jason Grissom <jgrissom@forefrontpower.com>
Sent: Friday, October 19, 2018 2:48 PM
To: Susan Burgstrom; 'David Dickson'; Tom Braman; Ed Switzer; Christopher Wall; Daniel Solorzano
Subject: RE: New Public Comment - Case #906-S-18
Attachments: Fwd: More Public Comment

Hi Susan,

We can work with all of the issues that Mr. Glasa presented. On other projects we have worked with the barbed wire, and as long as we are compliant with the NEC and all Authorities Having Jurisdiction, we can work with this. Re: the vegetative screening, we can work with the county, the community, and our landscaping engineer to ensure everyone is copasetic with the vegetative screening. I appreciate your time, and look forward to the final vote for the St. Joe projects.

I have also included an email I received directly from Mr. Glasa. It sounds like he is for the most part ok with the project as long as we meet his conditions.

Thanks,

Jason Grissom
Development Project Manager
jgrissom@forefrontpower.com | Direct: 512.293.5695

Forefront Power | www.forefrontpower.com
100 Montgomery Street | Suite 725 | San Francisco, CA 94104



RECEIVED

OCT 19 2018

CHAMPAIGN CO. P & Z DEPARTMENT

From: Susan Burgstrom <sburgstrom@co.champaign.il.us>
Sent: Friday, October 19, 2018 2:09 PM
To: 'David Dickson' <David.Dickson@westwoodps.com>; Tom Braman <Tom.Braman@westwoodps.com>; Jason Grissom <jgrissom@forefrontpower.com>; Ed Switzer <eswitzer@forefrontpower.com>; Christopher Wall <cwall@forefrontpower.com>; Daniel Solorzano <dsolorzano@forefrontpower.com>
Subject: FW: New Public Comment - Case #906-S-18

This was just received from Mr. Glasa, who is the owner of the property just north of St. Joe West. It will be forwarded to ZBA and if we have a memo to do this week, we will add it to that.

Thanks,
Susan

From: Bob Glasa <bglas1@gmail.com>
Sent: Friday, October 19, 2018 1:40 PM
To: zoningdept <zoningdept@co.champaign.il.us>
Subject: New Public Comment - Case #906-S-18

To Whom it May Concern,

Attached to this e-mail is further Public Comment with regard to Case #906-S-18. I thank you for your time and attention to this matter.

Bob Glasa

Susan Burgstrom

From: Bob Glasa <bglasa1@gmail.com>
Sent: Friday, October 19, 2018 2:04 PM
To: Jason Grissom
Subject: Fwd: More Public Comment
Attachments: Public Comment Letter dated Oct 19 2018.docx

RECEIVED

OCT 19 2018

CHAMPAIGN CO. P & Z DEPARTMENT

----- Forwarded message -----

From: Bob Glasa <bglasa1@gmail.com>
Date: Fri, Oct 19, 2018 at 2:01 PM
Subject: More Public Comment
To: Jason Grissom <jgrissom@forefronpower.com>

Hello Jason,

I appreciated your presentation last evening and the chance to introduce myself. For the record, I would much rather the land to the South of me remain in agricultural pasture, but - given the changes you've made to the site plan - I am no longer your staunchest and most vocal opponent.

I'm attaching to this message a Public Comment document that I mailed to the County Zoning Board this morning; wanted you to see it as soon as possible. I hope that your expressed sincerity to "work with us" should this project move forward results in a development the reflects the stated concerns of the Neighbors.

Bob Glasa

October 19, 2018

I write today to provide further Public Comment with regard to ZBA Case # 906-S-18. My name is Bob Glasa and I live at 1753 CR 2200 East in St. Joe, Illinois. My comments today are made following the Public Hearing on this Case held last night. I wish to briefly address two topics that I, and my neighbors, feel strongly about should this project ultimately move to the final design and – hopefully not - build stage.

- 1) **Fencing:** I'll be blunt. A barb wire "capped" fence would be about the ugliest and most offensive thing that could be put on the site. It would make living next to the site feel as if I were living next to a prison. I think even driving by it would invoke feelings of intrusion and "territorial bullying". The presence of a barb wire fence would be a daily reminder that Forefront Power "muscled" its way onto this site in defiance of the expressed desires of the neighbors and citizens of St. Joe. No doubt it would reinforce already held negative attitudes about the solar farm and engender new enemies as well. It is completely contrary to the pastoral setting Petitioner has elected to build on, there is no requirement of any kind obligating the use of barb wire, and it would be of no value to increasing the security of the site. From Petitioners perspective, it would add unneeded expense to the project. Talk about a Lose-Lose proposition. A barb wire capped fence is a horrible idea. **Any plan to use barb wire to "cap" the perimeter fencing should be dropped right here and right now.**

- 2) **Visual Screening:** I'm happy that Petitioner seems to recognize the importance of effective visual screening to the neighbors and the community and that they've stated their willingness to be flexible and use the plants that "we" desire. Great. During last night's meeting, the public testimony of the neighbors was unanimous in telling Petitioner that we really don't want to look at the developed site. As such; all plantings used in the Visual Screening effort should be chosen for their ability to effectively serve their purpose; meaning **all Plantings should be as tall all possible, they should be "effective" from the time they are planted (no "little plants" that grow into an effective screen over time) , they should be planted as closely together as possible to provide maximum density, they should provide effective screening during all 4 seasons of the year, and they should have a prospective life-span of at least 20 years.** Further, and consistent with the dialog on this topic last night, I hereby formally request that Forefront Power reach out proactively to all "contiguous neighbors" and any neighbor living within one half mile of the site to solicit their input with regard to desired plantings during the design phase of the project. And I ask that the County Board establish a means by which petitioner's efforts and actions in this regard can be tracked and monitored for compliance.

RECEIVED

OCT 19 2018

CHAMPAIGN CO. P & Z DEPARTMENT

I thank you for the opportunity to provide comment.

Respectfully Submitted,

Robert L. Glasa