May 31, 2013

Ms. Andrea Moffatt WSB & Associates 701 Xenia Ave S, Suite 300 Minneapolis, MN 55416

RE: City of Houston South Park – LAWCON Land Use Change to Allow Motorized Vehicles T103 R6 S4 Houston, Houston County WSB Project Number: 1738-04 SHPO Number: 2013-2052

Dear Ms. Moffatt:

Thank you for the opportunity to comment on the above project. It has been reviewed pursuant to the responsibilities given to the State Historic Preservation Officer by the National Historic Preservation Act of 1966 and implementing federal regulations at 36 CFR 800.

Under 36 CFR 800.4(b)-(c) it is the Federal agency's responsibility to identify and evaluate historic properties that may be affected by the proposed project. In absence of the Federal agency's finding and due to the nature and location of the proposed project, we recommend that an archaeological survey be completed. The survey must meet the requirements of the Secretary of the Interior's Standards for Identification and Evaluation. For your information, we have enclosed a list of consultants who have expressed an interest in undertaking such surveys.

We will reconsider the need for survey if the project area can be documented as previously surveyed or disturbed. Any previous survey work must meet contemporary standards. **Note:** plowed areas and right-of-way are not automatically considered disturbed. Archaeological sites can remain intact beneath the plow zone and in undisturbed portions of the right-of-way.

If you have any questions regarding our review of this project, please contact Kelly Gragg-Johnson at (651) 259-3455.

Sincerely,

Mary Arin Heidemann, Manager Government Programs and Compliance

Enclosure: List of Consultants



STATE HISTORIC PRESERVATION OFFICE

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September 5, 2013

Ms. Christina Peterson, City Planner City of Houston 105 West Maple Street PO Box 667 Houston, MN 55943

RE: South Park – LAWCON Change T103 R6 S4, Houston, Houston County SHPO Number: 2013-2052

Dear Ms. Peterson:

Thank you for the opportunity to comment on the above project. It has been reviewed pursuant to the responsibilities given the State Historic Preservation Officer by the National Historic Preservation Act of 1966 and implementing federal regulations at 36 CFR 800.

We have reviewed the cultural resources survey report that was prepared for this project. Based on the results of the survey, we conclude that **no historic properties will be affected** by this project.

Please contact Kelly Gragg-Johnson at (651) 259-3455 if you have any questions regarding our review of this project.

Sincerely,

Barbara Howard Deputy State Historic Preservation Officer

cc: Andrea Moffatt, WSB & Associates Wendy Holtz-Leith, MVAC

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Minnesota Historical Society, 345 Kellogg Boulevard West, Saint Paul, Minnesota 55102 651-259-3000 • 888-727-8386 • www.mnhs.org

Minnesota Department of Natural Resources

Division of Parks and Trails 1200 Warner Road St. Paul, MN 55106



January 28, 2010

Mayor Connie Edwards City of Houston 105 W. Maple St PO Box 667 Houston, MN 55943

Mr. Larry Jerviss Houston City Administrator 105 W. Maple St PO Box 667 Houston, MN 55943 Mr. Tom Steiger Rochester Rough Riders 4x4 Club 10025 40th Ave NE Elgin, MN 55932

Mr. Jeff Klein Twin Cities Trail Riders Motorcycle Club PO Box 4101 Hopkins, MN 55343

Mr. Milo Bjerke Rochester Golden Eagles Motorcycle Club 11500 55th St NW Byron, MN 55920 Ms. Karen Umphress Twin Cities Trail Riders Motorcycle Club 8051 W 195th St Jordan, MN 55352

Re: DNR preliminary review of potential Houston Off-Highway Vehicle Trail System

Dear Mayor Edwards, Mr. Bjerke, Mr. Jerviss, Mr. Klein, Mr. Steiger, and Ms. Umphress:

This letter summarizes the Department of Natural Resources' preliminary comments, concerns, and recommendations regarding the proposed location for a potential grant-in-aid (GIA) off highway vehicle (OHV) trail system near Houston, Minnesota. We believe this information will help you — the applicants and sponsor—collaborate for the best possible proposal for a sustainable trail system.

Process to date

Discussions among DNR Parks and Trails, the City of Houston, Houston County, and OHV recreational groups led to the decision by three organized clubs to apply to the city for formal grant-in-aid sponsorship in July 2010. The clubs outlined a 600-plus acre footprint held by six different land owners, within which they believed a high quality recreational trail system could be developed.

The clubs wanted to move quickly on acquisition to take advantage of current favorable economic conditions and limited-duration landowner interest. Consequently the clubs prepared grant-in-aid applications for acquisition activities only, deferring the more common components of GIA applications (such as proposals for specific trail layout/development work). The clubs applied through the city for a total of \$200k, including \$150k (for the Rochester Rough Riders off-road vehicle (ORV) club) and \$50k (shared between the Rochester Golden Eagles off-highway motorcycle (OHM) club and the Twin Cities Trail Riders OHM club). These dollars were to provide a match for \$150k of federal Recreational Trail Proposal funds previously awarded to the City of Houston and the Rochester Rough Riders ORV club.

DNR Parks and Trails staff and representatives from the clubs provided information on the proposal at a city hearing on August 9, 2010. On August 23 the Houston City Council passed resolutions approving sponsorship for the ORV and OHM acquisition applications. The applications were forwarded to DNR in late August for approval and processing.

After receiving the GIA applications from the city, DNR Parks and Trails regional staff met to discuss next steps. While it appeared likely that a sustainable motorized trail system was feasible in the area, the division staff requested an interdisciplinary DNR team 'coarse filter' review of the area within the city-approved project boundary prior to the expenditure of acquisition funds. Because the Blufflands possess unique natural features, environmental protection is particularly important; the Parks and Trails regional team decided a proactive approach to identify potential concerns earlier in the process was judicious. [As background, DNR interdisciplinary Area Teams are always involved in GIA reviews, but are more familiar with GIA processes in which they are consulted on environmental factors bearing on a specific proposed trail alignment, rather than a general area.]

Field visits were held on October 7 and 29, 2010 to allow interested area team staff to assess portions of the project area of interest or concern to them. The team was provided a map of the project area footprint (see attached), as well as basic information on the GIA proposals to-date. Thirteen staff from four DNR divisions (Ecological and Water Resources, Fish and Wildlife, Forestry, and Parks and Trails) attended one or both days. On both days, Tony Schultz, son of landowners in the project area and a city councilman, visited with the area team and accompanied them for portions of the site visits.

All visiting staff asked questions and provided oral comments, and several staff provided written comments. Parks and Trails staff then met to review the comments at the regional level, involving DNR Central Office and program staff as appropriate, to integrate the comments into the established GIA process. The meetings culminated in a Parks and Trails presentation to the DNR Central Regional Management Team (RMT) on December 6, 2010. (The RMT is the Department's interdisciplinary leadership team, which in consultation with the Regional Director provides strategic direction on natural resource conservation and management.) The RMT expressed support for the process by which the project is advancing, and requested they be kept informed on progress.

Field Comments

Comments and concerns raised after the field visit are summarized below.

Erosion Potential – Reviewers saw soil erosion as the greatest potential issue requiring advance planning. Some reviewers questioned whether it was possible for a trail system to be compatible with bluff terrain. Observations included:

- The blufftop would likely hold up to motor vehicle use.
- Trails on bluff slopes are currently in moderate condition but appear to have limited (mainly equestrian) use. Loss of ground vegetation will increase erosion risk.
- Considerable care in trail design, construction, and maintenance (including re-alignment of current trails that may not hold up to increased use) will be needed to make the trails sustainable to increased use by vehicles.

- Developing sustainable trails in this highly erodible terrain (especially any trails in ravines or gullies) will be a challenging, technical, and expensive task that should, among other things, avoid significantly contributing sediment downstream.
- The level of technical expertise required to design/build/maintain the trail system will likely exceed standard levels in most grant-in-aid systems.
- The trail planning and design process should include expertise in soil erosion (for example, Natural Resources Conservation Service or Soil and Water Conservation District staff).
- Houston County ordinances and land use restrictions (for example, Bluff Land Protection, and Soil Erosion and Sediment Control ordinances) need to be applied to the project as appropriate.
- A trail system should be designed, built, and operated so as to complement ongoing environmental stewardship efforts in the surrounding area, for example the effort to reduce sediment loads in the Root River and Lower Mississippi River watersheds.
- The clubs and city must be prepared to commit to a long term maintenance responsibility. The state of Minnesota needs to recognize that the funding and technical assistance commitment is long term (at least 20 years).

<u>Rare species -</u> Staff observed that the DNR's Natural Heritage database shows several occurrences of state listed and rare species within or adjacent to the project area (Amethyst Shooting Star, American Ginseng, and a Timber Rattlesnake location). It is important to note that the locations identified in the Natural Heritage database are not exhaustive and should <u>not</u> be taken to mean other individuals or species are therefore <u>not</u> found at other locations. In fact, it is likely, given the quality of the natural communities in the project area, that more occurrences of the identified species, and/or other not yet identified

endangered/threatened/special concern species, are located within, or adjacent to, the project area.

- While none were observed during the site visits, there is definite potential for timber rattlesnakes within the project area based on proximity to known dens, and suitable rock structures and bluff prairie habitat within the project area.
- Recreational use can likely be managed to limit effects on the species (e.g., locating trails far enough away from den/basking areas to minimize snakes using trails as basking areas).
- Trail placement should avoid steep south- and west-facing slopes as that could degrade these areas and negatively affect any potential dens by disrupting the rock structure.
- Bluff prairie species typically occur on the bluff face itself, so avoiding trail placement on these bluffs will minimize impacts to these plant species as well.
- Some species that occur in the project area are included on the 'species in greatest conservation need' (SGCNs) list from the DNR's *Comprehensive Wildlife Conservation Strategy (CWCS)*. Trail placement and management should be consistent with stewardship strategies for these species identified in the *CWCS*.

<u>Wildlife</u> – Staff observed that sound emissions from vehicles, increased traffic, and increased trail density may reduce wildlife use of an area. Maintaining tree canopy (where appropriate) and creating large undisturbed blocks of habitat within the trail system area can help lessen impacts to wildlife.

<u>Natural communities</u> – Staff observed that much of the project area is mapped and classified (as of the mid 1990s) as 'moderate biodiversity significance' by the Minnesota County Biological Survey. Field observations in October supported that classification.

- Red Oak/White Oak/Sugar Maple forest (native plant community type MHs37b) is the predominant forest type with more oak influence on south and west aspects and more maple and basswood on the north and east slopes.
- Dry Bedrock Bluff Prairies (Ups13c) and related communities exist at higher elevations and are in varying conditions. Some are very overgrown and others are in good condition (especially near rock outcrops). These communities are rare and declining in southeast Minnesota.
- Trail development should also consider invasive species. The potential for introduction and spread of invasives is high during construction and maintenance when fill or rock is brought in along with equipment, but can occur in disturbed soil conditions at other times as well. Best management practices to avoid and minimize the spread of invasives should be followed.
- The higher elevation locations are largely intact with only scattered invasive species.
- Lower locations are much more disturbed by grazing and other uses and are highly infested with buckthorn, honeysuckle, barberry, and other invasive species.
- Leaving blocks of forest without trails will help restrict invasives, and keep some of the habitat intact, which will also support birds (that need larger blocks of habitat).
- Keeping canopy cover on the north and east slopes will also be important, so trail development should strive to minimize canopy openings.

<u>Cultural resources</u> – Staff observed several sites identified by local landowners as being of potential cultural interest. No cultural resources specialists visited the project area during the October site visits. A followup office consultation was held with a DNR Parks and Trails archaeologist reviewing mapped locations and photographs of sites of interest. The archaeologist indicated that some sites clearly merited further investigation and that trail development should be conducted in such a way as to avoid such sites, but that trail system development in the project area should be possible while avoiding such sites. Further cultural resources review will be done once a trail alignment has been identified.

Opportunities for cultural resource interpretation should be considered in trail development.

Recommendations

Based upon the field visits and subsequent discussions, the DNR provides the following recommendations to the clubs and sponsor.

A key concern raised by field staff on the site visits was whether a motorized grant in aid trail system would be compatible with the terrain in the project area, i.e., would a trail system be environmentally sustainable given features in the area, particularly steep slopes and erodible soils?

After extensive discussions with area, regional, and central office staff, we conclude that the trail system can very likely be compatible with environmental sustainability, if the proposers dedicate adequate resources to proper construction and maintenance. These resources include careful planning (including environmental review), and sufficient expertise, money, and labor to design, build, and maintain the trail system for a minimum 20 year life. Unmanaged or poorly managed trails could erode the bluff and degrade water quality in the nearby Root River. The trail system is likely to be expensive, and must be developed, constructed, and maintained to high standards.

The OHV clubs and city should consider the following as they move forward with the project:

Our preliminary review marks the beginning of the grant in aid process, not the end, and is not a sign-off on constructing a trail system.

- Acquisition work for the trail system should proceed with the understanding that no trail alignment has been proposed by the clubs or sponsor, nor been approved by DNR.
- Acquisition work can be reimbursed within the limits of the grant-in-aid program, but no on-theground trail work will be reimbursed by the grant-in-aid program until the required seven step grantin-aid review and approval process is completed.
- The club- and sponsor-driven planning process (see below) will be separate from, but must be integrated with, the DNR review and approval process for the GIA trail system. This highlights the need for ongoing communication and coordination among the clubs, the city, and the DNR to ensure these separate processes are working toward a shared vision of a sustainable trail system.
- An Environmental Assessment Worksheet (EAW) will likely need to be done for this project. For grant in aid projects, DNR is the responsible government unit (RGU).

A sustainable trail system in Houston requires a strong planning effort. The clubs and the city must lead the effort, with the DNR in a key supporting role.

- The DNR's review, and discussions with clubs, the trail sponsor, and community members have raised a number of issues regarding the project, including:
 - o Environmental and cultural concerns outlined by DNR staff, above;
 - Ensuring that trail system development is consistent with local, state, and federal environmental and cultural protections;
 - Planning to ensure vehicle sound emissions are managed consistent with state requirements and the preferences of the local community;
 - Planning for controlled access point(s) and boundary control for the trail system consistent with recreational user and local community values;
 - Planning for daily and seasonal hours of operation consistent with recreational user and local community values;
 - Planning to ensure that trails as laid out and constructed are environmentally sustainable, while also being recreationally sustainable, that is, extensive and interesting enough to users that they will return to ride the system on a recurring basis;
 - Recognizing and dealing appropriately with any fiscal impacts on local government revenues as a result of land moving from private to public (city) ownership;
 - Recognizing and planning for law enforcement and emergency medical response needs for the trail system;
 - Recognizing and ensuring long term (20 year minimum) commitment to the trail system by city government;
 - Recognizing and planning for visitor access to community services including camping/lodging, food, fuel, and so forth.
- The clubs and sponsor should strongly consider convening a multi-interest advisory committee to guide trail system planning. Please consider the following recommendations:
 - o The advisory committee should be formally established by the city;
 - It should include representatives from the city and the clubs proposing the trail system;
 - The city should establish an explicit governing document for the advisory committee that sets expectations and rules for membership, leadership, decision-making processes, and deliverable products, including by when and to whom;
 - The city should have an open process for identifying organizations/interests that should be represented on the committee, including interests that may have concerns about the trail

system, such as local environmental groups and government entities such as the local Soil and Water Conservation District, and/or Natural Resources Conservation Service;

 DNR Parks and Trails should participate on the committee to help coordinate the committee's work with that of the DNR grant-in-aid review process.

The DNR has a strong interest in supporting a sustainable, long-term GIA system and is willing to commit resources, both within and outside the grant-in-aid process, to help make the locally-driven effort a success.

- DNR will provide support through the grant-in-aid process of funding, staff, and technical expertise.
- The likelihood of long term funding of the trail system will be enhanced by adding ATV interests/viewpoints/dedicated funds to the current combination of ORV/OHM interests. We encourage the current applicants and sponsor to continue to seek inclusion of the ATV community in trail system planning.
- DNR is willing to provide additional support as needed in the form of outside staff and funding for trail planning, development, construction and maintenance. This could include DNR staff, or nationally-recognized experts such as Trails Unlimited or the National Off Highway Vehicle Conservation Council. The extent of support available will depend on available funding.

I hope this summary of the DNR review is helpful to you as you move forward with this project. Please don't hesitate to contact me with questions or concerns about the information contained in this letter. As always, I look forward to working with you on this, and other, projects.

Kind regards

Paul Purman Acquisition and Development Specialist Division of Parks and Trails, Central Region 1200 Warner Rd St. Paul, MN 55106 Ph: 651.259.5874 Fx: 651.772.7977 Paul.purman@state.mn.us

Cc: Craig Blommer, Rich Bruns, Joe Kurcinka, Ron Potter, Joel Stedman, Mary Straka, Jordan Wilms, Jan Shaw Wolff, Rebecca Wooden, Aaron Wunrow; site review field staff; Central Region RMT; ATVAM, ARMCA, MN4WDA



Engineering
Planning
Environmental
Construction

701 Xenia Avenue South Suite 300 Minneapolis, MN 55416 Tel: 763-541-4800 Fax: 763-541-1700

Technical Memorandum

To:	Lisa Joyal, Department of Natural Resources
CC:	Melissa Doperalski, Department of Natural Resources Andi Moffatt, WSB & Associates, Inc. Kelsey Johnson, WSB & Associates, Inc.
From:	Alison Harwood, WSB & Associates, Inc.
Date:	March 5, 2013
Re:	South Park LAWCON EA - Rare Features Review City of Houston, Minnesota WSB Project No. 2181-000

The above-referenced project was reviewed for potential conflicts with known occurrences of rare natural resource features. The South Park Project (Project) is located in Houston County in Section 4 of Township 103N, Range 6W (**Figure 1**). South Park was first developed in 1974 with Land and Water Conservation Fund (LWCF) assistance, and additional parcels have been acquired throughout the years. The existing parkland is 278 acres and provides a wide array of active and passive outdoor recreation opportunities.

The City of Houston is proposing to change the land use in an approximate 80-acre parcel of South Park (**Figure 1**) from its existing land use designation, which allows for strictly non-motorized uses, to allowing an off-highway vehicles (OHV) trail system. At this phase of Project development no trail alignments have been designated, but the conversion of land uses on the LAWCON property requires an environmental review.

This memo serves to solicit a response from the DNR and summarize the rare features near the Project in an effort to determine potential environmental impacts for the LAWCON Environmental Assessment being developed. On behalf of the City of Houston, we are requesting concurrence from the DNR that the findings from this review are accurate.

A review of the Minnesota DNR licensed Natural Heritage Information System (NHIS; License # LA-579, issued May 16, 2011) revealed several rare species within an approximate one mile radius of the Project area. A review of the USFWS Section 7 Consultation Technical Assistance website was also conducted for Houston County. While two Federally endangered and candidate species are found within the county, neither has habitat that is present within the Project area. The rare features found in proximity to the Project area are summarized in **Table 1**.

Table 1: Results of Rare Features Review (for Features within 1 mile of the Project
area)

Feature	Location	State Rank	Federal Rank
Crystal darter (Ammocrypta asprella)	T104N, S32	Special Concern	N/A
Henslow's sparrow (Ammodramus henslowii)	T104N, S34	Endangered	N/A
Splendid tiger beetle (<i>Cicindela</i> splendida cyanocephalata)	T103N, S4, 8, & 9	Special Concern	N/A
Timber rattlesnake (Crotalus horridus)	T103N, S33	Threatened	N/A
Jewelled shooting star (Dodecatheon amethystinum)	T103N, S4, 5, 8, & 9	No Status	
Blanding's turtle (<i>Emydoidea</i> balandingii)	T104N, S32 & 33; T103N, S5	Endangered	N/A
Rattlesnake-master (<i>Eryngium yuccifolium</i>)	T103N, S9	Special Concern	N/A
Rough avens (Geum laciniatum var trichocarpum)	T103N, S9	No Status	N/A
American brook lamprey (<i>Lampetra appendix</i>)	T103N, S8 & 9	No Status	N/A
American ginseng (<i>Panax</i> quinquefolius)	T103N, S4 & 5	Special Concern	N/A
Purple cliff-brake (<i>Pellaea atropurpurea</i>)	T103N, S4, 5, 8, & 9	Special Concern	N/A
Dry Bedrock Bluff Prairie	T103N, S5 & 8		
Red Oak –White Oak – Sugar Maple Forest	T103N, S4 & 5		

The Minnesota County Biological Survey (MCBS) Sites of Biodiversity Significance database was also reviewed and the results are summarized below and are shown on **Figure 2**.

Minnesota County Biological Survey - Sites of Biodiversity Significance One MCBS site of biodiversity significance exists with the Project area. This site extends through the north and western ³/₄ of the Project area, and is described as a site with Moderate biodiversity significance. The site roughly corresponds to the Red Oak – White Oak – Sugar Maple Forest identified by the NHIS.

As mentioned previously, the current Project involves only a change in allowable land use from non-motorized transportation activities to allowing OHW. No OHW trail alignments have been proposed at this time. As such, a change in land use alone will not result in impacts to any of the rare features listed in **Table 1**. As the Project moves further through development, it is anticipated that OHW trail alignments will take into considerations the features listed herein.

Future work within the Project area may require additional approvals from the Department of Natural Resources, Wetland Conservation Act, US Army Corps of Engineers, Minnesota Pollution Control Agency, and City of Houston.

March 4, 2013 Page 3

If you have any questions or concerns regarding this review, please feel free to contact me at (763) 231-4847 or aharwood@wsbeng.com.

Attachments Figure 1: Project Location Figure 2: Rare Feature Review Area





City of Houston, MN

750 1,500 3,000 0 Feet







City of Houston, MN

750 1,500 3,000 0 Feet



From:	Thomas Cinadr [thomas.cinadr@mnhs.org]
Sent:	Wednesday, February 27, 2013 10:04 AM
То:	Kelsey Johnson
Subject: Attachments:	Re: City of Houston, MN - South Park Archaeology.rtf

THIS EMAIL IS NOT A PROJECT CLEARANCE.

This message simply reports the results of the cultural resources database search you requested. The database search produced results for only previously known archaeological sites and historic properties. Please read the note below carefully.

No historic structures were identified in a search of the Minnesota Archaeological Inventory and Historic Structures Inventory for the search area requested. A report containing the archaeological sites identified is attached.

The result of this database search provides a listing of recorded archaeological sites and historic architectural properties that are included in the current SHPO databases. Because the majority of archaeological sites in the state and many historic architectural properties have not been recorded, important sites or structures may exist within the search area and may be affected by development projects within that area. Additional research, including field survey, may be necessary to adequately assess the area's potential to contain historic properties.

If you require a comprehensive assessment of a project's potential to impact archaeological sites or historic architectural properties, you may need to hire a qualified archaeologist and/or historian. If you need assistance with a project review, please contact Kelly Gragg-Johnson in Review and Compliance @ 651-259-3455 or by email at <u>kelly.graggjohnson@mnhs.org</u>.

The Minnesota SHPO Survey Manuals and Database Metadata and Contractor Lists can be found at <u>http://www.mnhs.org/shpo/survey/inventories.htm</u>

SHPO research hours are 8:00 AM – 4:00 PM Tuesday-Friday. The Office is closed on Mondays.

Tom Cinadr

Survey and Information Management Coordinator Minnesota State Historic Preservation Office Minnesota Historical Society 345 Kellogg Blvd. West St. Paul, MN 55102

651-259-3453

On Tue, Feb 26, 2013 at 9:44 AM, Kelsey Johnson <<u>kjohnson@wsbeng.com</u>> wrote:

Tom,

Good Morning! We've worked together in the past, but it has been a while since I last contacted you. My name is Kelsey Johnson and I am a planner with WSB & Associates, Inc. Currently I am assisting the City of Houston with an environmental review of "South Park". I've attached a project location map for your reference and have included the Section, Township, and Range below. Could you please take a look at the proposed site and provide me with any information from your database relating to historic and archaeological findings that might be identified in this area?

Section(s): 4 & 5 Township: 103 Range: 6

Please let me know if you need more information.

Thank you!

Kelsey Johnson, AICP Municipal Planner d: 763-287-8521 | c: 612-360-1284 WSB & Associates, Inc. | 701 Xenia Avenue South, Suite 300 | Minneapolis, MN 55416

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Archaeological Site Locations

Site Number	Site Name	Twp.	Range	Sec.	Quarter Sections	Acres Phase	Site Description	Tradition Context	Reports	NR	CEF	DOE
County:	Houston											
21HU0050	Ask	103	6	4	SE-SE-NE	2 1	LS					