



Gwich'in Renewable Resource Board

P.O.Box 2240, Inuvik, NT X0E 0T0
Phone: (867) 777.6600 Fax: (867) 777.6601
<http://www.grrb.nt.ca>

Gwich'in Renewable Resource Board Meeting Sittichinli Complex Arena, Aklavik, NT Oct 3&4, 2007 Aklavik, NT

Board Members:

Robert Charlie, Chair
Eugene Pascal, GTC

Dan Topolniski, DFO
Paul Latour, CWS
Robert Alexie Sr., GTC

RRC:

Fanny Greenland, Ehdiitat RRC,
Jerome Gordon, Ehdiitat RRC

Guests:

Ron Morrison, ENR
Ian McLeod
Erin Hiebert, DFO
Sarah Frosbery, DFO
Terry Stein, DFO
Larry Dow, DFO
Wade Norman, DFO

Staff: Melody Nice Paul, Exec Dir.
Tanya Andre, Office Manager,
Amy Thompson, Biologist

Bobbi Jo Greenland, TK Manager
Nathan Millar, Biologist (fisheries),
Brian Dokum, GRRB Technician

Amanda Joynt, DFO Biologist
Kevin Bill, DFO Biologist

Ground Caribou in zone G/BC/02 which is in the northern area of the Gwich'in Settlement Area. This motion was passed and followed up with letters to the Minister and a copy was sent to Ron Morrison.

The Board also recommended that information packages and posters be developed to educate the people on the difference between the Barren Ground Caribou and the Boreal Woodland Caribou.

The Board also recommended that GNWT /ENR CHAP funding that is provided to local RRC for harvesting activities be used for educational purposes and not used to support community hunts for caribou.

Action Item # 3-10-07

Seek a response to the letter sent to GNWT earlier this year.

3. The Board also made a recommendation that satellite information showing locations of collared caribou on their web site be removed. A letter was also sent to the PCMB and the information showing locations of satellite collared caribou has been removed.

Action Item # 4-10-07

A support letter was written to the Governments of Canada, Yukon and Northwest Territories supporting the PCMB's request for additional funding to carry out their activities.

4. Land Claim Liaison position (DFO) – a letter was written to DFO requesting that this position be re-located back to Inuvik and that it be filled by an aboriginal person.
5. Caribou decline. Due to the decline in the caribou GRRB sent a letter to the GTC – recommending that they advise the local RRC not to allocate funds from the CHAP for community hunts.

Other Business Arising from Minutes

Dan Topolniski feels that the Board does not receive sufficient feedback from government “the Board has made resolutions and written letters but no answers are received”. The Board needs to push harder to get a response back.

5. Financial Update:

Executive Director Melody Nice Paul provided a review of the Operations Budget. We are operating with a budget of \$697,781.00 for this year and we are 6 months into our budget. To date our revenue is \$322,465 and our expenses are

\$260,000 leaving us with a surplus of \$62,000. The Office has faced multiple expense increases in rent, auditing and staffing.

The Wildlife Studies Fund allocated \$256,765 for 2007/08 fiscal year. Later today and tomorrow the Board will receive reports on the status of these projects.

6. *Audited financial Statements for 2006 - 2007*

The Wildlife Studies Fund "principle" investment was turned over to Phil Anselmo of RBC. The principle investment of approximately \$2,690,000.00 has been put into an investment portfolio consisting of: 60% bonds, 30% Canadian Equities and 10% International Equities. During July and August the bulk of the cash was moved into a target asset mix. We will receive another update at the end of the year (December).

Paul Teoh is the auditor for the board. His firm audits the General Operations Fund and also the Wildlife Studies Fund.

Motion 07-19 "To accept the GRRB Audited financial statement as Presented"

Moved: Eugene Pascal Second: Robert Alexie Sr.
All in Favor: Carried

Dan Topolniski would like to see the auditor's present at one of our meetings to present our financial statements. He also feels that we should advertise for a new auditor for the next fiscal year.

Motion 07-20 "To approve the Wildlife Studies Fund Financial Audit as presented"

Moved: Robert Alexie Sr. Second: Paul Latour
All in Favor: Carried

7. *Office Update*

Melody Nice Paul, Executive Director

Melody started her position on September 04/07. Since her arrival Melody has spent the majority of her time reviewing the Board's Operations Manual as well as assessing the financial position of the Board and identifying solutions for reducing over budgeted expenses like audit fees etc.. Additionally, she is also working to address staffing issues such as job evaluations, job descriptions,

northern allowance, wages and benefits. She is presently working on securing additional funding to help cover non-budgeted expenses.

Brief update on our staff – Tanya Andre is the new Office Manager and Catherine Lambert our Wildlife Biologist is on maternity leave until next August 2008.

Regarding work activities Melody stated that the GRRB staff continues to balance research activities with management priorities such as contributing to various working groups in order to provide assistance in developing specified management plans.

In closing Melody stated that she is delighted to have the opportunity to learn more about the interests, concerns, experiences and vision, of the Board members, for the future.

Meeting breaks for 10 minutes @ 10:15am.
Meeting back at 10:25am

Continue with staff updates:

8. **Robert Charlie, Chairperson**

Robert provided a written update on his activities over the past few months. Robert spent a lot of his time working the administrative portion of the office as there has not been an Executive Director to perform these duties. In June, he attended a staff meeting and a meeting for the Rat Char Closure and some associated meetings. In July, he was involved in a tele-conference for the Rat Char Closure for a follow up. Also Robert was involved in the ED hiring process and worked on retrieving quotes for a purchase of a new vehicle for the Board.

A copy of Robert's Activity Report is included in the binder.

9. **Staff Update:**

Tanya Andre, Office Manager

Tanya gave a verbal update. Tanya is new to the position and spent most of her time familiarizing herself with the Board's financial books and office procedures. Tanya spent a large amount of time working with Robert Charlie on multiple tasks in the office. She is happy to be on board, and she is enjoying the work and working with the rest of the staff.

Bobbi Jo Greenland, Traditional Knowledge Manager

Bobbi Jo gave a power point presentation on her activities performed over the last few months. Bobbi Jo worked on the creation of our yearly calendar and is presently working on securing additional funding to help cover the expenses.

The Youth work experience is still an on going program with the GRRB and has proven to be a very positive program. In June, the GRRB hosted a student through the skill links program. This program helps the students to develop skills to go back into the work force.

This year the Board was successful in placing eight summer students in job placements. Nathan and Brian were able to take some of the youths out on the land to Travaillant Lake and to the Vittrekwa River. All the youth that were working gained valuable experience and would like to return in the future. A survey had been conducted with the youth to see what worked and what didn't. In September, Bobbi Jo and Amy visited a few of the schools and gave presentations about the environment and to encourage students to get into the science field and possibly work with the Board in the future.

Bobbi Jo is recommending that the Board set guidelines for the summer student positions as presently there are no guidelines for her to follow when hiring. She also feels that the younger applicants are not receiving a fair chance to obtain a summer position with the Board as they are competing with older, experienced applicants. She would like the Board to reconsider the classifications pertaining to the age groups that apply for summer employment.

Web design, maintenance – Bobbi Jo would like to enhance her skills in this area, as she feels that her position should be able to look after the GRRB web page and maintenance of the page.

Nathan Miller, Fisheries Biologist

Nathan gave a quick review of his work activities for the last few months. He is now back on as a full time staff member. His summer was very busy as he is involved with the management of the Rat Char project. Attending meetings and teleconference and working on providing the local surrounding communities with information on the Rat Char. Nathan has been looking after the website and the maintenance of the page as the cost to have someone come in to update it and maintain it is very costly. Nathan added an addition to the web page, sound files that give the Gwichin pronunciations of different fish. As well, has added another page called GRRB in the news which is a repository of news articles that relate to staff work and to resource management issues in the GSA.

Nathan has provided some in kind support to Duck Unlimited. He went to their camp out at Cardinal Lake to see what they were doing and he was very impressed with their work and how they look after the land.

Other activities, committees and working groups that Nathan is involved with are Mackenzie River Fish Tagging Study (DFO), Water Sampling for (SFU), Beaufort Sea Partnership, and NWT Cumulative Impact Monitoring Program.

Amy Thompson, Special Projects Biologist

Provided a brief update on her work activities, Amy has been busy attending workshops, conducting interviews and attending meetings with Nathan on the Rat Char. In June, she attended community workshops with the local harvesters and traveled to Sachs Harbour for Oceans Day. A copy of Amy's report is included in the binder.

Brian Dokum – Renewable Resource Technician

Brian, Amy and Bobbi Jo did presentations to the high schools in Inuvik and surrounding communities about career goals. They spoke on their educational backgrounds and positions that their education has provided them with. Brian works on the Dall Sheep Project and in March he accompanied two snow monitors from Ft. McPherson and Aklavik on a one day trip out on the land to show them how to operate the GPS's and how to properly record information needed when they are snow monitoring. In May, Brian helped with the grizzly bear monitoring program and collared 8 grizzly bears. In June, he spent 3 weeks out on the land in the Richardson Mountains Observation Camp monitoring and collecting data on the behavior of the Dall sheep. In July he took part in the Travaillant Lake fish monitoring project, collecting fish samples from Travaillant Lake. August was spent up at Vittrekwa River studying the Dolly Varden Arctic Char. They caught and tagged the Char and then released them. A copy of Brian's report is provided in the binder.

Meeting breaks for Lunch at 11.55am

Meeting back in @ 1:05 pm

10. Board Member Updates & Presentations

Dan Topolniski - Dept of Fisheries and Oceans

There was a large controversy over the Dolly Varden Char Planning workshop held in Winnipeg by DFO this summer. DFO did not actively involve the Gwich'in or other Board interests. The staff at DFO, were trying to get their own act together and get some ideas on the go, and try to get some things started that would be suitable to bring back to the Boards. This did not work out and lead to an appropriate letter from the Chair of the GRRB. On a positive note, senior staff in the region are starting to pay attention to the Arctic Char Fisheries.

Dan had a bit of interaction with the Area Director in Yellowknife, Ed Debruyne in arranging a meeting with Bob Lambe, Senior DFO official. Dan feels that it was very positive that Robert and Melody had a chance to meet and discuss concerns with both senior officials.

A concern for Dan is that he does not know when to speak on behalf of the Board. He would like to see Melody revisit the Operating procedures as she stated earlier. Robert Charlie commented on Dan's concern stating that he as the Chair will speak on behalf of the Board when needed or Melody will.

A request from DFO is "what are the priorities identified by Gwich'in for fisheries"? Projects are going every which way by the DFO, it would be better if we knew what the priorities for the Gwich'in settlement area were. This leads to the importance of planning or strategic planning that would set out overall directions for the Board.

Paul Latour – Canadian Wildlife Service

Wildlife issues regarding birds will be discussed later on. Paul, who is also member of the Sahtu Board, reminded the group that the SRRB will be holding public hearings in order to set limits on the harvest of the Blue Nose West herd.

CWS has been hit with a massive budget cut and as a result everything has been frozen. They are reallocating old monies to make a clean air project. This has drawn a lot of media.

Robert asked how long the budgets will be cut back and how will it effect the north. CWS is a co management partner and this will effect how the GRRB operates. Paul said for sure until the end of this fiscal year and probably next year as well.

Item Action # 05-10-07

Send a letter to the Minister of Environment expressing concerns about the potential implications of how the cutbacks in CWS will effect GRRB operations. The letter needs to also be cc'd to the Director of CWS.

Eugene Pascal – Gwich'in Tribal Council

Eugene has been involved with Rat River Char projects, and Dall sheep project. He would like to be more involved with Board activities. He is currently not working and available to travel on behalf of the board.

Eugene has noticed some changes over the years in regards to the land; he would like to know what rights do we have with regards to Polar Bears in the GSA?

Robert Charlie – we will start utilizing the Boards Members skills and start having them attend other meetings so that they can be more involved.

Robert Alexie Sr. – Gwich'in Tribal Council

There was a Polar Bear in Ft McPherson. Where was the bear relocated? He heard that the bear was dropped off up in the coast of Shallow Bay. Robert wanted to know why the bear wasn't dropped off further. The people in the delta want answers to all these questions and Robert suggests that the answers to these questions be put into the monthly newsletter. Ron Morrison stated that relocation of bears sometimes doesn't work here as we are limited to how far we can move a bear before the drug wears off.

Robert was also concerned about the water and expressed the importance of watering sampling. The water in Tsiigehtchic is good and well looked after. Robert wants to see more fish sampling of loche and whitefish.

James Firth – Gwich'in Tribal Council

James was unable to attend the board meeting; he had forward his concerns to the Chair, Robert Charlie to read out on his behalf, he states "In relation to the RRC's, we are now at the end of the 15 yr period of receiving funding from the government, we are now operating with Gwich'in money, I feel that the RRC's need to be more involved. We need to start finding ways to build more capacity, get more engaged, and encourage our youth to be more involved. The GRRB is dependent on the RRC's to provide us with some direction on research activities and proposals for on the land activities. Over the next few months we should look at some sort of strategic planning session with the RRC's.

RRC Update

The report received from the Ehdiiat Renewable Resource was read out by Coordinator Jerome Gordon. The RRC has been busy with co-management boards in the region, working on declining issues with the caribou herd, helping and looking after local harvesters. A copy of the report is available in GRRB binder.

11. Research and Management Priorities

Rat Char Management – Robert Charlie and Nathan Millar

The annual Rat Char meeting was held with the Ft Mcpherson and Aklavik RRC's, Aklavik HTC, FJMC, GRRB and DFO in attendance. We received the latest information from DFO. The meeting had a good turn out and we decided to go with the closure but first consulted with the local communities and the people agreed with the recommendations so we will be moving ahead with the closure.

An issue that needs to be addressed is the decline of the Rat Char population, today it is down by 3 or 4 thousand. The working group meets annually in March to review

new data and agree upon a new fishing plan. Next step, start consulting the communities and setting harvest limits. Work towards increasing the communication between the working group and communities and possibly develop a Dolly Varden management plan for all the Char.

10 minute break

Resume at 2:48pm

Grizzly Management Plan - Tabled

Draft Dall sheep Management Plan – presented by Amy Thompson & Ron Morrison

Ron Morrison and Amy Thompson presented the Board with information on the draft management plan for the Dall sheep. They provided an update on where the working group is with the plan and went over the elements and actions and some background information. There are 5 elements in the management plan; population monitoring, harvest issues, habitat, education and information exchange and cooperation. The Plan is to address most aspects of the management plan and possible ranking and prioritizing the actions, this way if resources are not available to complete all of the actions, the most important actions will be done first. Review of the management plan is available in the GRRB binder.

Action Item #06-10-07

Follow up on the Draft Dall sheep Management Plan to ensure recommendations forwarded by Catherine, earlier this year, are incorporated in the Draft (March 2007).

12. RRC Meeting - Cancelled

Ron Morrison, E.N.R

Ron gave an update on the staffing situation with the ENR and the surrounding communities, field operations and research programs and monitoring programs. Ron would like to meet with the Board to discuss or establish a working group for the Blue Nose Caribou. A written report is available in the meeting binder.

Paul Latour

Presentation – *Species at Risk*

*in its mouth
in the air ("on the wing")*

Paul spoke on the Common Night Hawk; the night hawk catches insects on its wings. It has a 2 foot wing span and a flat head. They have dropped by half and no one knows why. This may be due to contaminants. They have gone from no listing to threaten species. Paul feels that there is a need to develop a strategic plan and an action plan. Paul is seeking support of the Board, by way of a letter of support, regarding the listing of the Common Night Hawk

Paul also mentioned that Breeding Bird surveys have been done in Ft Mcpherson, Tsiigehtchic and in the Caribou Creek area. 49 species were documented. He suggests that CWS and GRRB review options for songbird monitoring.

GRRB will follow up on letters –funding and support of listing

Meeting adjourned at: 5:15pm

Resume Oct 5/07 @ 8:30am

*Friday Oct 5/07
Fall Board Meeting
Sittichinli Complex Arena
Aklavik, NT*

Staff Present: All

Board Members Present: Robert Charlie, Paul Latour, Dan Topolniski, Robert Alexie Sr, Eugene Pascal

Public: President of AK RCC – Fanny Greenland

Meeting Called to order: 8:55

Item 14 – Project Updates

**Dall sheep, Grizzly Bear and Wolf Project
Presented by Brian Dokum and Amy Thompson**

Brian and Amy provided an update on the research activities for the Dall sheep, grizzly bear and wolf project in the Richardson Mountains. A copy of the report is available in the binder

Robert suggested more awareness within the communities – notices, letters etc. informing hunters of our mission and notifying them of our intentions and that we have collared animals and to not target them as it is a costly procedure to collar and retrieve animals.

Traditional Knowledge Interviews: who will be conducting them? Melody was not sure but will follow up with Catherine.

**GRRB Fisheries Projects
Presented by Nathan Millar**

Nathan spoke on different projects that are on going from previous years and new projects that have just begun.

Aerial Photography and Habitat Assessment of the Rat River, this project will be conducted by helicopter, GPS and camera. The main idea is to create a good photo record of the habitat that can be used to assess future changes.

The Dolly Varden project is now into its 2nd year of research. Nathan had spent 2 weeks out on an upper tributary of the Vittrekwa River collecting data and learning more about the rate of growth, feeding habits and migration of the char. Copy of presentation is available in the meeting binder.

Loche Project
Presented by Amy Thompson

Amy provided an update on recent projects and discussed the plans for the work being conducted in the next few months. A written presentation is available in the meeting binder.

Item 15 – Agency updates

Larry Dow, DFO

Larry Dow gave an update on the current staffing situation within DFO and informed the Board that the Oil & Gas positions are all filled. Next year there will be substantial funding available in the GSA for oil and gas related projects. Larry recommends that the GRRB meet with him to discuss any future planned activities that may require funding or supplies. The DFO's main objective is to fund projects and should the GRRB need any field equipment or supplies to send in a proposal as soon as possible.

Terry Stein, DFO

Update on staffing, there is one position not staffed yet with oil & gas department in DFO. Spoke on the closure of fishing for the Dolly Varden. He had heard of a couple fishers that where fishing during the closure. He doesn't know how many fish where caught but they were targeting the Dolly Varden char.

Erin Hiebert, DFO

Erin provided an update on the Rat River Char Monitoring project and the Tagging Project at Rat River. The three monitors for Rat Char were John Carmichael, Selwyn Kay and Billy Wilson. All three monitors filled their quota of 40 char. Information was provided to Lois and she will draft up a report. Two Fishery Management co-ordinators were hired in Ft Mcpherson and Tsiigetchic. These projects are funded by the GRRB. . Reports on data collected will be available for the Board in January 2008. A written presentation is available in the GRRB meeting binder.

A special farewell ceremony was undertaken to acknowledge the contributions made by members of the working group. Presentations were made by both Erin Hiebert and Robert Charlie.

Dan Topolniski would like the Board to insure that contact information and communications with Erin is clear and logged properly before she leaves DFO. Louise will be working with the data and will be the contact for the Dolly Varden Char. Erin will email all information regarding new contacts.

Norm Snowshoe, Director of Lands, Resources and Implementation

Norm gave a verbal update on the process of the NW SARA Act, the status of Blue Nose Caribou Herd, Resource Management for moose tagging, Dempster Highway Regulations and harvesting issues. The SARA Act is in the drafting stage now. He spoke on the Blue Nose Caribou herd that is declining. A report went out recently and he is encouraging the Boards to get together to implement the recommendations. Moose tags are being allocated to hunters and he feels there are too many tags being issued which could not be sustainable for moose. Caribou being sold is another concern. There may be an increase at the community level, of selling caribou meat. Our Agreement states that we cannot sell meat but the Land Claim says we can trade or barter. The Board needs to define this wording and develop guidelines to address this situation. There will be a meeting in Ft McPherson with harvesters on Oct 12/07 to inform them of the rules of hunting. A written report is available in the GRRB meeting binders.

Item 16 – GRRB and GSA Issue

Cotton Grass
Follow up – FYI

Climate Change
Amy Thompson

Amy would like to look into climate change, as she is very interested in this area. She would like some direction from the Board. She thought maybe to develop a project to monitor all resources to see effects of the climate change.

In – Camera Session

Motion to go In Camera

Moved by: Paul

Seconded by: Dan

Discussion during the in-camera session focused on the following items:

Auditor: the Board would like to advertise for anyone interested in performing the Audit for the Board Operations and Wildlife Studies Fund. This is a normal operations procedure to obtain quotes from companies in performing this function. The Board needs to ensure that we are receiving a fair price from interested companies.

We will also check with other similar Boards to see what they are paying for their Auditors. eg. SRRB

Board Operations/Wildlife Studies Fund – Presently both pots of money are in one bank account which makes reconciliation and tracking of costs more labor intensive. The Board suggested that we open a separate account for the Wildlife Studies Fund.

Wildlife Studies Fund – discussion centered on our activities for the upcoming 2008/2009 research year. There were three scenarios, continue with allocation as we have in the past, fund only existing projects or dig into the principle.

A suggestion was made to hold a “Strategic Planning Session” to develop a plan for the next 3-5 years. For this year we will not support any new projects but we would fund any multi-year projects and deal with other projects on a case-by-case basis.

Vehicle – we will do the necessary repairs and lease the vehicle for one more year. At the end of this year we will buy the vehicle and lease a new one.

Operations/Procedures Manual – we will include a Communications Policy and also the Investment Policy.

We will obtain a copy of the Investment Policy from RBC and distribute to Board Members for their review.

Operations Manual – Maternity leave. We will maintain the existing policy but will review the section on length of employment.

Section 6.33.1-Benefits, as per handout.

Section 6.24.2 - .5 days at Christmas and New Years eve.

We will review all Job Descriptions and associated Salary and Benefits for all positions.

We will work with staff on Work Plans so that we have an idea of job activities throughout the year. Any new responsibilities will be included.

Trade and Barter – discussion on Commercial activity and traditional sharing. We will start working on this immediately.

Grizzly Bear Hides – Problem Bears. Presently all “problem bear” hides are property of the GRRB. This is so that an individual does not profit from killing a bear and saying it was a problem bear. Discussion ensued with a suggestion that existing bear hides be given away to the schools. Any new “problem bear” hides will be sold at auction with the funds accrued to the Board operations budget.

It was also mentioned at this time that we review “Board Member” attendance at meetings.

Next meeting is scheduled for February/2008.

Action Items
GRRB Board Meeting
Aklavik, NT - October 5-6, 2007

- 01-(10)-07 **Draft minutes to be prepared and distributed to Board members in a suitable time frame.**
- 02-(10)-07 **Distribute Investment Policy.**
Investment policy for the Wildlife Studies Fund has been included in this binder (inside front cover sleeve).
- 03-(10)-07 **Seek a response to the letter sent to GNWT earlier this year.**
See attached letter.
- 04-(10)-07 **A support letter was written to the Governments of Canada, Yukon and NWT supporting the PCMB's request for additional funding to carry out their activities.** This letter was indeed sent on March 8, 2007 see attachment.
- 05-(10)-07 **Send a letter to the Minister of Environment expressing concerns about the potential implications of how the cutbacks in CWS will effect GRRB operations.** Draft letter attached for your review.
- 06-(10)-07 **Follow up on the Draft Dull sheep Management Plan to ensure recommendations forwarded by Catherine are incorporated.**
The Dull Sheep Management Plan is currently under revision and the comments/recommendations collected during the 2007 consultations are being incorporated. Our office is expecting to receive a new draft in March, consultations with the RRC's will continue in 2008.

In Camera

- 07-(10)-07 **Request quotes for 2007-08 Audit of the GRRB General Operations and Wildlife Studies Fund.** Accomplished – to be discussed during in camera session on Feb 28, 2008
- 08-(10)-07 **Establish new and separate bank accounts for General Operations and Wildlife Studies Fund.** New bank accounts were established in November 2007.
- 09-(10)-07 **Hold a Strategic Planning Session.**
Funding was established to hold a Strategic Planning session in Feb 2008.

- 10-(10)-07 **Vehicle Repairs**
The GRRB truck was sent in for repairs in October. Repairs were minor only the rear seal needed to be replaced.
- 11-(10)-07 **Operations/Procedures Manual needs to include a Communications Policy and Investment Policy.** Work on this was interrupted when Bobbie Jo left our office, however, this will be a top priority once the Communications position has been filled. Both the Communications and investment policies will be included in the Operations and Procedures manual and will be made available for the Fall (2008) Board meeting.
- 12-(10)-07 **Review job descriptions, salaries and benefits.**
New job descriptions were developed for the Communications Coordinator and the Environmental biologist positions, salaries were also re-negotiated. Additionally, all staff members participated in performance reviews just this month.
- 13-(10)-07 **Staff Work-plans**
Work-plans were outlined in October 2007 however due to staff turnover these plans are now subject to change.
- 14-(10)-07 **Bear hides to be given to schools.**
The hides still remain in our office we hope to find a new home for them soon.
- 15-(10)-07 **Trade and Barter**
This topic will be included in the SPS with the RRC and the GTC. Our office has yet to receive a legal/professional opinion.