

River Plan / North Reach
Planning Commission Worksession
Reponses to comments on the Proposed Draft
February 24, 2009

TOPIC: River Restoration Program

1. BRIEF SUMMARY OF COMMENTS ON THE TOPIC: The comments reflect broad support for the River Restoration Program but also a strong desire for cost and revenue estimates and a feasibility study. One commenter misinterpreted the River Restoration Program as one that was intended to allow the City to meet its environmental obligations at industry's expense. Many other comments that relate to the River Restoration Program also relate to in lieu fees. See the handout titled "Recommended amendments to proposals that include a fee-in-lieu option", dated February 24, 2009.

2. STAFF-PROPOSED AMENDMENTS IN RESPONSE TO COMMENTS

a. Amendments for Discussion with Planning Commission

Staff proposes amendments as outlined below. Related comments and responses are attached.

Amendment 1: Amend the Action Agenda for Watershed Health to include additional information about the restoration sites including the estimated cost to acquire, restore and manage the sites, to include the Department of State Lands as the owner of the in water portion of sites and additional information such as prioritization and clean up costs as available.

RELATED COMMENTS: #29, #65, #89, #248, #258, #268, #285, #298, #342

Amendment 2: Amend Volume 1A to provide more detail about the proposed River Restoration Program, and develop a work plan to put the program in place.

RELATED COMMENTS: #37, #184, #246, #280, #354, #369

b. Minor Amendments

Comments and responses are attached. Minor amendments are included in the staff response section of each comment.

c. Technical Amendments

Comments and responses are attached. Technical amendments are included in the staff response section of each comment.

3. COMMENTS THAT DO NOT REQUIRE AMENDMENTS

Comments and responses are attached.



**2. a. PUBLIC COMMENTS RELATED TO AMENDMENTS FOR
DISCUSSION WITH PLANNING COMMISSION**

Report of River Plan Comments

<u>Topic 1:</u>	River Restoration Program	<u>Topic 2:</u>	All	<u>Topic 3:</u>	All	<u>Comment Type:</u>	Major policy
<u>Comment ID:</u>	All	<u>Staff Entered:</u>	All	<u>Commentor:</u>	All	<u>Hearing Date:</u>	All
<u>Geo Area:</u>	All	<u>Volume:</u>	All	<u>Document Edited?:</u>	All	<u>IOC Section:</u>	All
<u>Staff Assigned:</u>	All	<u>Comment Addressed?:</u>	All	<u>Individual Review:</u>	All		

Topic 1: River Restoration Program

Comment ID:	29	Commentor:	Audubon Society - Bob Sallinger
Comment:	The Plan fails to provide a cost estimate for protecting and restoring the restoration sites. In order to realistically assess the feasibility of this plan, the City should have a ballpark figure of how much the system of restoration sites will cost. We recognize there are many variables but a cost range with accompanying explanation of variables is appropriate and necessary for the city and the public to make an informed decision.		
Response:	<p>The following rough costs have been identified: Acquisition costs: \$35 - \$95 million Restoration costs: \$130 million Total: \$165 - \$225 million</p> <p>Please see the River Plan / North Reach Acquisition and Restoration Cost Estimates memo to Planning Commission dated February 17, 2009 for details.</p> <p>We will add these costs to the next draft document.</p>		
Comment ID:	37	Commentor:	Audubon Society - Bob Sallinger
Comment:	The plan does not contain adequate analysis of the feasibility of the City establishing permanent protections on the 20 restoration sites. The success of this plan from an environmental perspective is predicated on the protection of these sites. Failure to achieve protection for the vast majority of sites over time would not allow for adequate protection of fish and wildlife species. The plan should provide a realistic and detailed assessment of the challenges and probability of protecting each individual site.		
Response:	Staff understand the desire to have this information but we won't know if we can acquire the sites until we have the funding and can enter into and complete negotiations.		

Comment ID:	65	Commentor:	Port of Portland - Susie Lahsene
Comment:	<p>The Port is concerned that there is inadequate emphasis placed on the fully-fleshing out the restoration opportunities and the creation of improved habitat for the North Reach. The Port wants the restoration opportunities to be more fully described, because they are concerned that many of them may be too contaminated or degraded to bring back to restored habitat. They want staff to identify natural resource sites and really detail out the cost of restoration. Also, some of the pearls conflict with PDC's Harbor ReDI sites.</p>		
Response:	<p>A considerable amount of research has been conducted on the restoration sites including estimates of acquisition and restoration costs. However, these costs assume clean sites so restoration will either be more expensive or will not be completed until the sites area has been cleaned up. The following rough costs have been identified: Acquisition costs: \$35 - \$95 million Restoration costs: \$130 million Total: \$165 - \$225 million</p> <p>Please see the River Plan / North Reach Acquisition and Restoration Cost Estimates memo to Planning Commission dated February 17, 2009 for details.</p> <p>We will add these costs to the next draft document.</p> <p>With regard to the overlap of the restoration sites with the Harbor ReDI sites: Staff believes that, with good site design, it is possible to achieve both restoration and development on the same site.</p>		
Comment ID:	89	Commentor:	Friends of Cathedral Park - Barbara Quinn
Comment:	<p>Because Ballimore Woods connects wildlife to Kelley Point Park via Smith and Bybee Lakes/Pier Park to the north and the proposed Willamette Cove natural area/ Cathedral Park to the south, it offers an increased habitat area essential to wildlife survival. We ask that funding by the 1% fee of any off site restoration/acquisition of upland deciduous habitat be concentrated on its preservation.</p>		
Response:	<p>The restoration prioritization criteria are listed at the top of page 33 in volume 1A. Since this upland area is likely much less contaminated it would rank higher.</p>		
Comment ID:	184	Commentor:	Department of Environmental Quality - Keith Johnson
Comment:	<p>DEQ would like to see more detail of what an "ambitious off-site restoration program" consists of.</p>		
Response:	<p>The River Restoration Program is an implementation component of the River Plan. Program details are under development.</p>		

Comment ID:	246	Bureau of Environmental Services
Comment:	<p>Adopt adequate land use controls and funding mechanisms for the proposed River Restoration Program. Some of the sites listed in Section II.B.2 "Action Agenda" are owned by the City of Portland and Metro, but a majority of the listed sites are in private ownership (we strongly endorse adding Cathedral Park to the list, either as part of RS4 or as a separate site). We remain concerned, however, that the river environmental overlay zone will be an insufficient tool to protect these 20 sites from development until such time as they can be acquired or otherwise permanently protected through conservation easements. We also remain concerned that restoration of these 20 sites will be frustrated by landowners who are unwilling to participate in restoration activities.</p> <p>Please develop a feasibility study prior to plan adoption to further investigate the feasibility of the restoration projects listed on pages 63-64. BES and the Port have tried to implement some of the projects listed in the plan tables pages 63-64 and they have not proved feasible due to contamination levels or unwilling property owners. BES is concerned that development will proceed and restoration funds generated will not result in habitat enhancement project implementation.</p> <p>--The Port investigated the feasibility of conducting mitigation at Willamette Cove and found it to be cost prohibitive. Please contact Port staff to get a copy of their feasibility study and/or information about contamination levels and resulting costs for potential mitigation at this site.</p> <p>--The City tried to enter into an agreement to conduct mitigation at PGE's Harborton wetlands, however, the property owner was not willing to enter the agreement. Has this property owner been contacted to see if he/she might be interested in having off-site mitigation conducted on their property? If PGE wants to conduct mitigation at Harborton wetlands to fulfill its own NRDA mitigation it would not be useful as a potential off-site mitigation area.</p> <p>--The marina owner is not likely to be interested in easements (over Miller Creek) on his property.</p>	
Response:	<p>River Staff recognize the problem stated by BES. If the Restoration Program is not in place or if there are no approved sites, BDS will not have the option of allowing applicants to mitigate or restore off site.</p> <p>River Staff will add Cathedral Park to the list of restoration sites.</p> <p>We understand that acquisition and restoration of the sites will be a challenge for many reasons but river staff do not have staff or funding to conduct the requested feasibility study. This task will need to be a follow up implementation project.</p>	
Comment ID:	248	Bureau of Environmental Services
Comment:	<p>Funding for the restoration program is proposed from the following sources: a proposed "restoration regulation" (as proposed by staff at the 12/9/08 PC hearing), a fee-in-lieu of mitigation for unavoidable impacts to natural resources within the river overlay zone, mitigation required by state and federal agencies and compensation for past damages determined through the Natural Resources Damage Assessment process. We remained concerned, however, that the identified funding sources will not be adequate to support the program.</p> <p>Please provide a cost estimate for the projects listed on pages 63-64 of the plan. Please also provide an estimate of the amount of funds to be generated by the River Restoration Fund.</p> <p>Proposals to lower the cost of compliance should be accompanied by a fiscal analysis to show how the goals of the restoration program can be achieved with reduced funding levels.</p>	
Response:	<p>Based on a rough analysis it appears that acquisition of the restoration sites will cost approximately \$35 - 95 million. Restoration of the sites will cost approximately \$130 million. We will include these figures in Volume 1A.</p> <p>This comment also concerns in lieu fees. See amendments under the in lieu fee topic.</p>	

Comment ID:	258	Bureau of Environmental Services
Comment:	Further evaluate the off-site management fee for the river restoration fund and consider increasing that number to 50% (page 172). The off-site management fee needs to include the costs of project management, engineering design, permitting, survey, construction management, monitoring, and ongoing maintenance. For the Stephens Creek confluence project, these costs were equal to the cost of construction. Please evaluate the cost of construction vs. all other implementation costs (as a percentage) for the following projects: Burlingame, Brownwood, Ramsey, and the Columbia Slough confluence.	Commentor:
Response:	<p>After further discussion with staff at BES and re-evaluation of River Plan staff assumptions regarding the tasks included in the management fee, we recommend that the management fee be increased. The unit costs in the proposed fee calculator include construction costs only. All other costs associated with installing and managing a restoration project (including all phases of design, engineering, permitting, etc.) are included in the management fee. Staff will continue to work with BES to ensure that the charge reflects the work that needs to be done. Staff will also explore third party management options.</p> <p>This comment also concerns in lieu fees. See response under in lieu fee topic.</p>	

Comment ID:	268	Commentor:	Working Waterfront Coalition - Ann Gardner
Comment:	<p>Issue #5: River Restoration Program - Page 11, Vol 1B.</p> <p>Success of the program relies on purchasing and improving multiple properties from multiple private parties all within a federally listed superfund site. Would create pearls, requires willing seller, investments/long-term maintenance.</p> <ul style="list-style-type: none"> - No due diligence has been conducted. - No environmental site assessments have been conducted. - Financial strategy not fully developed. - Plans for improving the pearls are conceptual. 		
Response:	<p>Recommendation:</p> <ul style="list-style-type: none"> - Further develop concept, including financing strategy. - Conduct due diligence, environmental site assessments, and negotiate purchase agreements for the pearls prior to adoption of the River Plan. - Assume funding from multiple sources: <ul style="list-style-type: none"> Superfund/remediation mitigation NRD Development Fed/state mitigation Public/Private Grants - Address overlap of sites with City Harbor Redi-initiative. - Connect site selection to economic and science based criteria. - Commit to third party management. 		
Response:	<p>River Plan staff have been working to address the concerns raised in this comment and we have made substantial progress. Several of these issues will require continued due diligence as we move forward with the River Plan/River Restoration Program:</p> <ol style="list-style-type: none"> 1. Rough cost estimates for restoring the sites referred to as the "pearls" have been established. 2. Additional conceptual designs for improving the restoration sites have been developed in order to establish the cost estimates, however the design ideas will remain conceptual until the program is up and running and there are sites to begin restoring. 3. E.D. Hovee and Associates has produced a development projection in dollar amounts for the time period between 2009 and 2028. These estimates have been helpful in discussions regarding expectations for funding sources for the river restoration program. 4. River Plan staff have continued to meet with representatives of State and Federal agencies and the Natural Resource Trustees to forward the concept of establishing a mitigation bank so that City, State and Federal mitigation requirements can be better coordinated and required mitigation can be funneled to the restoration program. 5. River Plan staff are working with a consultant to develop the River Restoration Program. River Plan staff have worked with Commissioner Amanda Fritz and the newly designated Office of Healthy Working Rivers to identify opportunities that office may have for developing and implementing the River Restoration Program. The final program design may or may not include third party management. 6. The restoration site prioritization criteria is listed on page 33 of Volume 1A. 7. Some of the restoration sites overlap with the Harbor Redi sites but staff believes that it is possible to achieve both restoration and development on the same site through good design. 		

Comment ID:	280	Commentor:	Schnitzer Steel, Floyd Snider - Ann Gardner
Comment:	<p>It is unclear from the text how the City's River Restoration Program will overlap with or incorporate the Natural Resource Damage Assessment (NRDA) process for the Portland Harbor Superfund Site. The language used in the River Plan/North Reach is vague:</p> <p>"The restoration program will be structured to also accommodate mitigation required by state and federal agencies, and compensation for past damages determined through the Portland Harbor Natural Resource Damage Assessment (NRDA) process."</p> <p>"Accounting methods under consideration follow accepted methods used by state and federal agencies to assess natural resource values and determine appropriate compensation for impacts to those values. The accounting system will track mitigation resulting from City requirements and those required by others."</p> <p>This overlap of the City's Program with the NRDA process raises multiple concerns. For landowners with CERCLA liability, this may mean that landowners are assessed mitigation obligations on their property both by NRDA and by the City for development and/or for cleanup efforts under DEQ's jurisdiction.</p>		
Response:	<p>The Restoration Program is being designed to manage funds and restoration in the North Reach. The accounting system will keep track of where the money comes from and the restoration accomplished with that money.</p> <p>Some landowners will have multiple obligations due to their clean up, past damages and current development related mitigation and enhancement requirements. These requirements are for different actions related to the property owner.</p>		
Comment ID:	285	Commentor:	Schnitzer Steel, Floyd Snider - Ann Gardner
Comment:	<p>SSI is concerned that no financial plan has been presented to discuss the cost of acquisition, restoration, and maintenance of the identified natural resource sites. It is difficult to accept terms for payment into a River Restoration Fund where this type of plan does not exist. SSI recommends that the City provide a detailed financial plan that presents cost information for acquisition, restoration, and maintenance of all identified natural resource sites.</p>		
Response:	<p>The River Restoration Program is under development. Here are some key components of the financial plan:</p> <ul style="list-style-type: none"> --Development value from 2009 - 2028: \$431 - \$696 million --1% of development value: \$4.3 - 7.0 million (potential revenue) --Cost to acquire restoration sites: \$35 - 95 million --Cost to restore the restoration sites: \$130 million (does not include clean up) 		
Comment ID:	298	Commentor:	Port of Portland - Greg Theisen
Comment:	<p>The environmental success of the River Restoration Program relies on the financing, purchase and improvement of multiple properties within a superfund site.</p> <p>The Port recommends:</p> <ul style="list-style-type: none"> - Conduct due diligence. - Develop financing strategy. - Commit to third party management. 		
Response:	<p>The City will continue to develop the restoration program but does not anticipate that all aspects of this implementation program will be in place until dedicated staff are assigned to it and funding is available. There is commitment to involve a third party in the program but not necessarily third party management.</p>		

Comment ID:	342	Commentor:	Evraz Oregon Steel - Debbie Deetz Silva
Comment:	<p>The River Restoration fee in-lieu was generally supported as it would allow for plantings in areas of the river where it makes sense as opposed to installing plantings in areas where they will not survive in order to comply with the Greenway code. However, the River Restoration Fund as currently outlined in the draft River Plan is not developed enough and should not be carried forward to City Council without substantial changes. Further work to evaluate, in a meaningful way, the costs and practicality of restoration of identified areas needs attention.</p>		
Response:	<p>Staff has conducted a considerable amount of research about the costs of restoration. The following rough costs have been identified: Acquisition costs: \$35 - \$95 million Restoration costs: \$130 million Total: \$165 - \$225 million</p> <p>Please see the River Plan / North Reach Acquisition and Restoration Cost Estimates memo to Planning Commission dated February 17, 2009 for details.</p> <p>We will add these costs to the next draft document. Further work on this implementation program will be done over the next year and beyond.</p>		
Comment ID:	354	Commentor:	Urban Greenspaces Institute - Mike Houck
Comment:	<p>It's unclear how the City intends to permanently protect, through acquisition, or other means, the anchor sites. It seems the same attention given the Industrial Investment Strategy needs to be accorded the anchor sites. While the mitigation fee and 1% restoration/enhancement fee would provide some funding for acquisition, it's abundantly clear those sources will not be sufficient.</p> <p>Why is there not an Anchor Habitat Investment Strategy comparable to the Industrial Investment Strategy?</p> <p>Industrial land owners have requested, and have been granted, a natural resource strategy that provides simplicity, increased use of their land base, and off-site mitigation options. The quid pro quo should be that land owners must be willing to make a significant contribution to help finance this new system.</p>		
Response:	<p>The River Restoration Program described on page 32 of Volume 1A summarizes the overall strategy. Staff will continue to develop the River Restoration Program over the next year and beyond.</p> <p>This comment also concerns in lieu fees. See proposed amendments under the in lieu fee topic.</p>		
Comment ID:	369	Commentor:	Willamette Riverkeeper - Kate Ross
Comment:	<p>Willamette Riverkeeper tentatively supports the framework for environmental protection and restoration described in the River Plan, however, it is critical that the City work out components of the plan which still remain vague.</p>		
Response:	<p>Staff is continuing to work out the details of the River Restoration Program.</p>		

2. b. PUBLIC COMMENTS RELATED TO MINOR AMENDMENTS

Report of River Plan Comments

Topic 1: River Restoration Program Topic 2: All Topic 3: All Comment Type: Minor policy
Comment ID: All Staff Entered: All Commentor: All Hearing Date: All
Geo Area: All Volume: All IOC Section: All
Staff Assigned: All Comment Addressed?: All Document Edited?: All Individual Review: All

Topic 1: River Restoration Program

Comment ID:	49	Commentor:	Kinder Morgan, Working Waterfront - Rob Mathers
Comment:	At certain locations along the North Reach, River Plan proposes to establish restoration sites on private industrial properties that allow the City to meet its environmental obligations at industry's expense.		
Response:	The restoration sites are intended to help property owners meet their environmental obligations. They are not intended to help the City meet its environmental obligations. We will edit Volume 1A to ensure that this is clear.		
Comment ID:	367	Commentor:	Willamette Riverkeeper - Kate Ross
Comment:	While we want to protect the anchor sites for the long term, we feel that a new watershed council for the lower Willamette is not necessary. There is, at present, a good amount of non-profit capacity with restoration organizations like Willamette Riverkeeper as well as numerous land trusts that are equipped to hold land along the river. Between such sources, long-term monitoring and management can take place.		
Response:	The proposed Willamette Watershed Council was intended to be a coordination body rather than one that holds land as referenced in this comment. Staff proposes to edit the document to clarify the intended purpose of the proposed council.		

2. c. PUBLIC COMMENTS RELATED TO TECHNICAL AMENDMENTS

Report of River Plan Comments

Topic 1: River Restoration Program Topic 2: All Topic 3: All Comment Type: Editorial/technical edit
Comment ID: All Staff Entered: All Commentor: All Hearing Date: All
Geo Area: All Volume: All IOC Section: All
Staff Assigned: All Comment Addressed?: All Document Edited?: All Individual Review: All

Topic 1: River Restoration Program

Comment ID:	253	Commentor:	Bureau of Environmental Services
Comment:	All standards of success need to explicitly state that the long term coverage consists of native plants. For example, on page 63, 1a requires that the site have 100% vegetation coverage. Please re-word to state 100% native coverage. Currently, there is a requirement to plant natives, but if the long term standard of success does not include the requirement for native species coverage, then the City will not be able to require that native plants are replaced if there is plant mortality.		
Response:	Staff will make the suggested change.		

3. PUBLIC COMMENTS THAT DO NOT REQUIRE AMENDMENTS

Report of River Plan Comments

Topic 1: River Restoration Program Topic 2: All Topic 3: All Comment Type: No edit required
Comment ID: All Staff Entered: All Commentor: All Hearing Date: All
Geo Area: All Volume: All TOC Section: All
Staff Assigned: All Comment Addressed?: All Document Edited?: All Individual Review: All

Topic 1: River Restoration Program

Comment ID:	10	Commentor:	Kinder Morgan, BP, NuStar - Phil Grillo
Comment:	Objection to Restoration Site 16 located at the Kinder Morgan Terminal in Willbridge - We have never supported a restoration program that mandates the designation of restoration sites over the objection of the landowner. Proposed Restoration Site 16 is a significant portion of Kinder Morgan's Willbridge Terminal site and has previously been planned as the location of a future dock and distribution facility. Kinder Morgan is therefore not willing to have this site identified on any map as a "Restoration Site." It is critical that no restoration site be identified on this property.		
Response:	Restoration Site 16 is adjacent to but not on the Kinder Morgan site.		
Comment ID:	173	Commentor:	Department of Environmental Quality - Keith Johnson
Comment:	Accounting system - is the City recreating the wheel with this? Metro has REIN and could be integrated into city efforts.		
Response:	The City is working with a consultant to develop an accounting system. We are drawing from existing tested systems. We will investigate Metro's REIN system.		
Comment ID:	174	Commentor:	Department of Environmental Quality - Keith Johnson
Comment:	According to the Trustees Council (blue insert) "additional restoration, replacement, and rehabilitation of natural resources will ultimately be necessary." This mostly regards the Portland Harbor cleanup-up site. Similarly, how and when will damaged areas such as those with long-term vegetation deficits be restored?		
Response:	The River Restoration Program proposal is targeted toward key restoration sites. BES' revegetation program will continue to help revegetate other areas citywide.		
Comment ID:	326	Commentor:	Robert J.L. Thompson
Comment:	Where there is not yet any riverside wetland I propose that the level of the river bank be lowered to near water level and planted with emergent plants. If there were a 30 foot (or so) setback for wetland construction along this section of the river it would allow for increased opportunity for beneficial microbes to process some of the river's nutrient and chemical load before the water continues on to the Columbia and the Ocean.		
Response:	Thank you for your comment. We will forward it to Bureau of Environmental Services restoration staff for consideration as they design restoration projects.		

Comment ID:	328	Commentor:	Robert JL Thompson
Comment:	The 6 acres of wetland in the cotton wood forest in zone WR2 are separated from the river by a berm. I propose the removal of this berm to allow the river to enter the wetland. It would also be helpful to enhance the river's connectivity with the 47 acres of wetland in zone WR3.		
Response:	Thank you for your comment. We will forward it to Bureau of Environmental Services restoration staff for consideration as they design restoration projects.		
Comment ID:	331	Commentor:	Army Corps of Engineers - Lawrence C. Evans
Comment:	The U.S. Army Corps of Engineers (Corps) considers the use of a mitigation bank first when considering options for providing required compensatory mitigation. Since most of the City is not within a service area of a mitigation bank and due to the reasons discussed above [see document], the Corps supports the development of a mitigation bank in the City of Portland.		
Response:	Thank you for your support of a mitigation bank for Portland. We look forward to working with you on its development.		
Comment ID:	336	Commentor:	W. Multnomah Soil & Water Cons. Dist. - D. Springer
Comment:	The District is particularly interested in the potential restoration sites identified on Map #6 (Volume 1A). Though our board has not taken any formal action on the recommendations and the District has until recently lacked the staff resources to participate in the extensive planning process, I want to share our ongoing support for protection and restoration of sensitive riverfront and riparian habitat.		
Response:	Thank you for your support of the River Restoration Program.		
Comment ID:	345	Commentor:	Urban Greenspaces Institute - Mike Houck
Comment:	The plan represents an improvement over the existing greenway code in that it calls for establishing twenty-one anchor fish and wildlife habitat sites.		
Response:	Thank you for your comment.		
Comment ID:	368	Commentor:	Willamette Riverkeeper - Kate Ross
Comment:	With regard to funding mechanisms, we believe that both the mitigation fees and restoration and enhancement fees are good and will work adequately for their intended purpose. Superfund liability does not excuse industry from having to proactively do its part to protect and restore natural resources in the North Reach. Superfund pays to remediate past damages and it should not in any way reduce the level of participation of industry in current restoration efforts.		
Response:	Thank you for your comment.		
Comment ID:	375	Commentor:	Working Waterfront Coalition - Ann Gardner
Comment:	With respect to the River Restoration Plan, we believe that one of the largest funders of the implementation will be the natural resource damage claims and the investments that we all will be making as we do our Superfund cleanup. There will be resources available that I don't think we've fully articulated and understood and quantified that this is achievable through a number of funding sources.		
Response:	Staff recognizes that funding through Superfund and NRDA have not been quantified. These numbers may not be available until 2012, an estimated date for the proposed record of decision.		

Comment ID:	404	Commentor:	Jan Secunda
Comment:	I support the recommendation that BES do maintenance on the public lands used as mitigation sites.		
Response:	Thank you for your comment.		

