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Chapter 4  
**Environmental Justice**

**4.1 Background**

Since the 1970s, public awareness and concern has increased over evidence that low-income and minority communities often suffer disproportionately from exposure to unhealthy environmental conditions. In response to increasing concerns, in 1994, President William J. Clinton issued Executive Order (EO) 12898 to raise awareness and bring environmental justice issues into public policy debate. EO12898, *Federal Actions to Address Environmental Justice in Minority and Low-Income Populations*, directed each federal agency to make achieving environmental justice part of its mission. The President specifically recognized the importance of using the procedures under the National Environmental Policy Act (NEPA) to identify and address environmental justice concerns. Although the federal/NEPA environmental document is being prepared and processed separate of this Draft EIR, because federal action is required for the proposed Project, this assessment is being included in the CEQA document. In addition, addressing environmental justice is consistent with California state law regarding environmental justice and the City of Los Angeles General Plan environmental justice policies related to ensuring the fair treatment of people of all races, cultures, and income levels, including minority populations and low-income populations of the state as related to activities that substantially affect human health or the environment ensures.

The purpose of this analysis is to determine whether or not disproportionately high and adverse human health or environmental effects of the proposed Project are likely to fall on minority and/or low income populations. This analysis focuses on high and adverse (significant unavoidable) effects as addressed in Sections 3.1 through 3.13 of this Draft EIR and examines the race and income characteristics of the populations receiving those effects.

**4.2 Environmental Setting**

The Project site is located in the Port of Los Angeles and adjacent to two City of Los Angeles communities: Wilmington (to the north) and San Pedro (to the west). For this assessment, the area of potential effect was determined in accordance with the Council on Environmental Quality’s (CEQ) guidance for identifying the “affected community,” which requires consideration of the nature of likely Project impacts and identification of a corresponding unit of geographic analysis. Therefore, the area of potential Project effect for purposes of environmental justice corresponds to the areas of effect associated with the specific environmental issues analyzed in the Draft EIR. Areas of potential effect differ somewhat for each environmental issue.

1 Environmental justice guidance from CEQ (1997) defines “minority persons” as  
2 “individuals who are members of the following population groups: American Indian or  
3 Alaskan Native; Asian or Pacific Islander; Black (not of Hispanic origin); or Hispanic”  
4 (CEQ, 1997). Hispanic or Latino refers to an ethnicity whereas American Indian,  
5 Alaskan Native, Asian, Pacific Islander, and Black/African-American (as well as White  
6 or European-American) refers to racial categories: thus, for Census purposes, individuals  
7 classify themselves into racial categories as well as ethnic categories, where ethnic  
8 categories include Hispanic/Latino and non-Hispanic/Latino. The 2000 Census<sup>1</sup> allowed  
9 individuals to choose more than one race. For this analysis, consistent with guidance  
10 from CEQ (1997) as well as USEPA (1998, 1999), “minority” refers to people who are  
11 Hispanic/Latino of any race, as well as those who are non-Hispanic/Latino of a race other  
12 than White or European-American.

13 The same CEQ environmental justice guidance (CEQ, 1997) suggests low-income  
14 populations be identified using the national poverty thresholds from the Census Bureau;  
15 guidance from USEPA (1998, 1999) also suggests using other regional low-income  
16 definitions as appropriate. Due to the higher costs of living in southern California  
17 compared to the nation as a whole, a higher threshold is appropriate for the identification  
18 of low-income populations. For the purposes of this analysis, low-income people are  
19 those with a household income of 1.25 times the national census poverty threshold. The  
20 1.25 ratio is based on application of a methodology developed by the National Academy  
21 of Sciences (Citro and Michael, 1995) and incorporates detailed data about fair market  
22 rents over the period of 1999-2007 for Los Angeles County from the U.S. Department of  
23 Housing and Urban Development (United States Department of Housing and Urban  
24 Development (HUD), 2007). Appendix G.1 of the HUD report contains a detailed  
25 description of the method used to derive the low-income definition.

26 To establish context for this environmental justice analysis, race and ethnicity (i.e.,  
27 minority) and income characteristics of the population residing in the vicinity of the  
28 proposed Project were reviewed. Table 4-1 presents population, minority, and low-  
29 income status from the 2000 Census and the Los Angeles City Planning Department for  
30 Wilmington, San Pedro, Los Angeles County, and city of Los Angeles, and California.  
31 The table also presents similar data for other cities in the general vicinity of the Port.  
32 Significant unavoidable impacts from the proposed Project could potentially affect areas  
33 within a one-mile radius of the proposed Project site, and thus is considered the affected  
34 area. The affected area includes portions of San Pedro and Terminal Island.

35 Table 4-1 shows that within Wilmington (as the neighborhood is defined by the  
36 Los Angeles Planning Department), minorities constitute 87.1 percent of the population  
37 and low-income persons constitute 32.2 percent of the population. Within the San Pedro  
38 community, minorities constitute 55.3 percent of the population and low-income persons  
39 constitute 22.5 percent of the population. Thus, the communities closest to the Project  
40 site represent a *minority population concentration* under CEQ guidance, which indicates  
41 such a concentration exists if the percent exceeds 50 percent, and the Wilmington  
42 community also represents a *low-income population concentration* because the low-  
43 income population exceeds the city percentage of 29.1 percent.

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<sup>1</sup> 2000 Census data is used in this analysis because community-level information from the 2010 Census is not currently available.

**Table 4-1: Minority and Low-Income Populations**

Area	Total Population	Percent Minority Population	Percent Low-Income Population (1.25% of poverty level)
California	33,871,648	53.4	19.2
Los Angeles County	9,519,338	69.1	23.9
City of Los Angeles	3,694,834	70.4	29.1
San Pedro	76,028	55.3	22.5
Wilmington	72,215	87.1	32.2
<b>Nearby Cities</b>			
Carson	89,730	88.0	13.4
Lomita	20,046	46.4	15.5
Long Beach	461,522	66.9	29.8
Palos Verdes Estates	13,340	23.9	2.2
Rancho Palos Verdes	41,145	36.9	3.5
Rolling Hills	1,871	23.56	1.3
Rolling Hills Estates	7,676	29.4	3.3
Torrance	137,946	47.6	8.8
West Carson	21,138	70.7	13.3

Source: U.S. Census Bureau, 2000

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## 2 4.3 Applicable Regulations

### 3 Executive Order 12898: Federal Actions to Address Environmental Justice in 4 Minority Populations and Low-Income Populations

5 In 1994, in response to growing concern that minority and/or low-income populations  
6 bear a disproportionate amount of adverse health and environmental effects, President  
7 Clinton issued Executive Order 12898 on Environmental Justice, formally focusing  
8 federal agency attention on these issues. The executive order contains a general directive  
9 that states that “each Federal agency shall make achieving environmental justice part of  
10 its mission by identifying and addressing, as appropriate, disproportionately high and  
11 adverse human health or environmental effects of its programs, policies, and activities on  
12 minority populations and low-income populations.”

13

1                   **California Government Code Sections 65041 – 65049; Public Resources Code**  
2                   **Sections 71110 - 71116**

3                   Environmental justice is defined by California state law as “the fair treatment of people  
4                   of all races, cultures, and incomes with respect to the development, adoption,  
5                   implementation, and enforcement of environmental laws, regulations, and policies.”

6                   The California Public Resources Code Section 71113 states that the mission of the  
7                   California Environmental Protection Agency (Cal/EPA) includes ensuring that it  
8                   conducts any activities that substantially affect human health or the environment in a  
9                   manner that ensures the fair treatment of people of all races, cultures, and income levels,  
10                  including minority populations and low-income populations of the state.

11                  As part of its mission, Cal/EPA was required to develop a model environmental justice  
12                  mission statement for its boards, departments, and offices. Cal/EPA was asked to develop  
13                  a working group on environmental justice to assist it in identifying any policy gaps or  
14                  obstacles impeding the achievement of environmental justice. An advisory committee  
15                  including representatives of numerous state agencies was established to assist the  
16                  working group pursuant to the development of a Cal/EPA intra-agency strategy for  
17                  addressing environmental justice. California Public Resources Code Section 71110 –  
18                  71116 charges the Cal/EPA with the following responsibilities.

- 19                  • Conduct programs, policies, and activities that substantially affect human health  
20                  or the environment in a manner that ensures the fair treatment of people of all  
21                  races, cultures, and income levels, including minority populations and low-  
22                  income populations of the state.
- 23                  • Promote enforcement of all health and environmental statutes within Cal/EPA’s  
24                  jurisdiction in a manner that ensures the fair treatment of people of all races,  
25                  cultures, and income levels, including minority populations and low-income  
26                  populations of the state.
- 27                  • Ensure greater public participation in the agency’s development, adoption, and  
28                  implementation of environmental regulations and policies.
- 29                  • Improve research and data collection for programs within the agency relating to  
30                  the health and environment of minority populations and low-income populations  
31                  of the state.
- 32                  • Coordinate efforts and share information with the USEPA.
- 33                  • Identify differential patterns of consumption of natural resources among people  
34                  of different socio-economic classifications for programs within the agency.
- 35                  • Consult with and review any information received from the Working Group on  
36                  Environmental Justice pursuant to developing an agency-wide strategy for  
37                  Cal/EPA.
- 38                  • Develop a model environmental justice mission statement for Cal/EPA’s boards,  
39                  departments, and offices.
- 40                  • Consult with, review, and evaluate any information received from the Working  
41                  Group on Environmental Justice pursuant to the development of its model  
42                  environmental justice mission statement.

- Develop an agency-wide strategy to identify and address any gaps in existing programs, policies, or activities that may impede the achievement of environmental justice.

California Government Code Sections 65040 – 65040.12 identify the Governor’s Office of Planning and Research (OPR) as the comprehensive state agency responsible for long-range planning and development. Among its responsibilities, the OPR is tasked with serving as the coordinating agency in state government for environmental justice issues. Specifically, the OPR is required to consult with the Cal/EPA, State Resources Agency, the Working Group on Environmental Justice, and other state agencies as appropriate, and share information with the CEQ, USEPA, and other federal agencies as appropriate to ensure consistency.

Cal/EPA released its final Intra-Agency Environmental Justice Strategy in August 2004 (California Environmental Protection Agency, 2004). The document sets forth the agency’s broad vision for integrating environmental justice into the programs, policies, and activities of its departments. It contains a series of goals, including the integration of environmental justice into the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.

#### **City of Los Angeles General Plan**

The City of Los Angeles General Plan has adopted environmental justice policies as outline in the Framework Element of the Transportation Element; these policies are summarized below (City of Los Angeles, 2010). The Framework Element is a “strategy for long-term growth which sets a citywide context to guide the update of the community plan and citywide elements.”

The Framework Element includes a policy to “assure the fair treatment of people of all races, cultures, incomes, and education levels with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies, including affirmative efforts to inform and involve environmental groups, especially environmental justice groups, in early planning stages through notification and two-way communication.”

The Transportation Element includes a policy to “assure the fair and equitable treatment of people of all races, cultures, incomes, and education levels with respect to the development and implementation of citywide transportation policies and programs, including affirmative efforts to inform and involve environmental groups, especially environmental justice groups, in the planning and monitoring process through notification and two-way communication.”

The City of Los Angeles also has committed to the Compact for Environmental Justice, which was adopted by the City’s Environmental Affairs Department as the city’s foundation for a sustainable urban environment. Statements relevant to the proposed project include the following:

- All people in Los Angeles are entitled to equal access to public open space and recreation, clean water, and uncontaminated neighborhoods.
- All planning and regulatory processes must involve residents and community representatives in decision making from state to finish.

### **South Coast Air Quality Management District: Environmental Justice Program**

In 1997, the South Coast Air Quality Management District (SCAQMD) adopted a set of guiding principles on environmental justice, addressing the rights of area citizens to clean air, the expectation of government safeguards for public health, and access to scientific findings concerning public health. Subsequent follow-up plans and initiatives led to the SCAQMD Board's approval in 2003-04 of an Environmental Justice Workplan. SCAQMD intends to update its workplan as needed to reflect ongoing and new initiatives.

SCAQMD's environmental justice program is intended to "ensure that everyone has the right to equal protection from air pollution and fair access to the decision making process that works to improve the quality of air within their communities." Environmental justice is defined by SCAQMD as "equitable environmental policymaking and enforcement to protect the health of all residents, regardless of age, culture, ethnicity, gender, race, socioeconomic status, or geographic location, from the health effects of air pollution."

## **4.4 Assessment**

Although not required by CEQA, the following assessment of potential disproportionate environmental effects to low-income or minority populations is consistent with the environmental justice guidelines for NEPA in the federal document Environmental Justice: Guidance Under the National Environmental Policy Act (CEQ, 1997).

### **4.4.1 Methodology**

To identify whether a proposed action is likely to have disproportionately high and adverse human health or environmental effects on low-income or minority populations (i.e., environmental justice impacts), demographic data were gathered for the potential impact area. For the proposed Project, the U.S. Census Tract group data for all census tracts that fall within a radius of one mile from the proposed Project boundaries was gathered. As described previously, the one mile distance represents the area within which significant unavoidable impacts from the proposed Project could potentially occur. Low-income populations are defined as census tracts with a higher percentage of the population below the 125 percent of the poverty level than the City of Los Angeles as a whole (29.1 percent), as identified in the 2000 U.S. Census. Minority populations are defined as block groups with greater than 50 percent non-Caucasian populations, as identified in the 2000 U.S. Census.

The purpose of this environmental justice analysis was to identify whether there would be any high and adverse effects as a result of the proposed ALBS improvements. The environmental analyses prepared for this Draft EIR were reviewed to determine which environmental or human health effects would remain significant after proposed mitigation measures were implemented.

1 There are five census tracts located within a one-mile radius of the Project site boundaries  
 2 as shown on Figure 4-1. The proposed Project is located in Census Tract 2961, which  
 3 includes the portion of Terminal Island within the boundaries of the Port of Los Angeles.  
 4 Census Tract 2961 has a population of approximately 1,434, which is primarily made of  
 5 up of the population on Reservation Point, which includes a federal correctional  
 6 institution and housing for prison wardens and U.S. Coast Guard personnel. The  
 7 population within the Port also includes those living in vessels moored at the Port  
 8 marinas (liveboards). As shown in Table 4-2 below, census Tracts 2961, 2962.10, and  
 9 2962.20 have a minority population over 50 percent and exceed the City of Los  
 10 Angeles's percentage of low-income population (U.S. Census Bureau, 2000).

**Table 4-2: Minority and Low-Income Characteristics in the Vicinity of the Proposed Project Site**

Census Tract	Total Population	Percent Minority	Percent Low-Income
2961	1,434	54.11%	30.97%
2962.10	2,858	62.84%	42.94%
2962.20	3,605	63.91%	62.69%
2971.10	4,547	46.40%	48.12%
2971.20	3,358	45.44%	39.65%
<b>Total</b>	<b>15,802</b>	<b>53.87%</b>	<b>48.43%</b>

U.S. Census Bureau Census, 2000

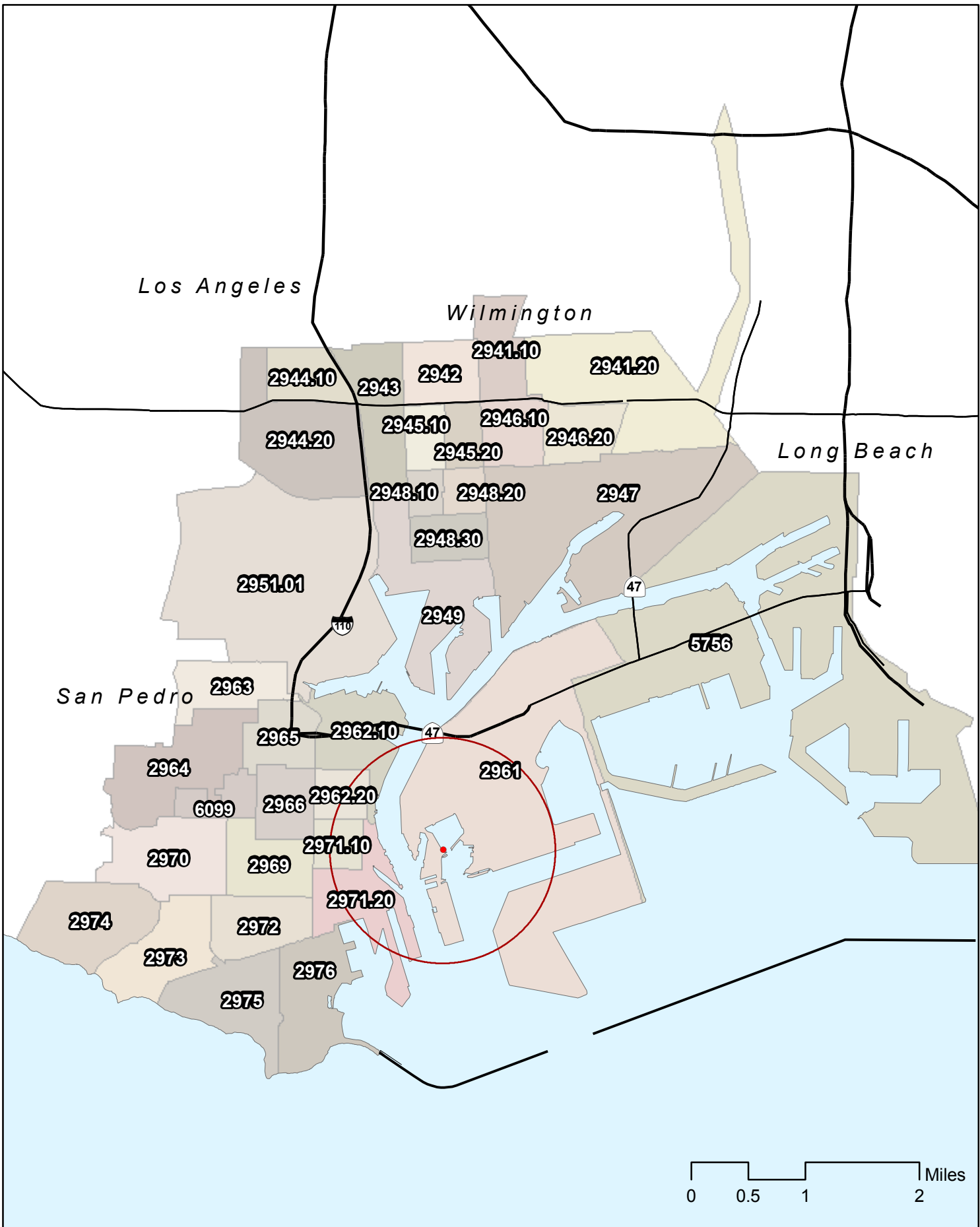
11  
 12 Based on the above information, it is concluded that the population within one mile of the  
 13 proposed Project site is predominantly nonwhite, and exceeds the City's average poverty  
 14 level.

## 15 **4.4.2 Assessment of Proposed Project and Cumulative** 16 **Effects**

17 Individual impacts associated with the proposed Project are described for each specific  
 18 resource in Chapter 3, Environmental Analysis, and proposed Project contributions to  
 19 cumulative impacts are presented in Chapter 5, Cumulative Analysis. This section  
 20 provides a summary of unavoidable significant impacts resulting from the proposed  
 21 Project and identifies those that would represent disproportionately high and adverse  
 22 effects on minority and low-income populations.

23 The following unavoidable significant environmental impacts would result from the  
 24 proposed Project:

- 25 • **Impacts AQ-1 and AQ-2-** Project construction would result in significant  
 26 ambient air quality impacts during Phase 1, Phase 2, and Phase 3. Residual air  
 27 quality impacts would be temporary during construction activities, but would  
 28 result in significant ambient air quality concentrations impacts in the immediate  
 29 vicinity of the proposed Project area, specifically Fish Harbor and the northern  
 30 portion of Reservation Point. This impact would affect Census Tract 2961 which



**Legend**



• Project Site



1-mile radius

Port of Los Angeles  
 Al Larson Boat Shop  
 Improvement Project  
 Local Area Census Tracts  
 Figure 4-1



1 is comprised of low income and minority population groups, including residents  
2 at Reservation Point (including federal correctional institution inmates, warden  
3 housing and U.S. Coast Guard housing) and the liveboards in the Al Larson  
4 Marina. Therefore, the proposed Project would result in a disproportionately  
5 high and adverse effect on minority and low-income populations.

6 **Mitigation Measures – MM AQ-1 through MM AQ-6**

7 **Determination After Mitigation** – Mitigation measures would reduce potential  
8 air quality and health risk impacts associated with construction, however impacts  
9 after mitigation would remain significant and unavoidable. Therefore Impacts  
10 AQ-1 and AQ-2 would result in a disproportionately high and adverse effect on  
11 minority and low-income populations.

- 12 • **Impact AQ- 4** - Project operation would exceed SCAQMD operational  
13 thresholds impacts for NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> in the immediate vicinity of the  
14 proposed Project area. Therefore the proposed Project would result in a  
15 disproportionately high and adverse effect on minority and low-income  
16 populations.

17 **Mitigation Measures – None available**

18 **Determination After Mitigation** – The main source of NO<sub>x</sub> emissions is the air  
19 compressors used during spray coating operations. The air compressors must be  
20 portable and cannot feasibly be replaced with electric units and no other feasible  
21 methods to reduce emissions were identified. As a result, no mitigation measures  
22 are proposed to reduce NO<sub>2</sub> emissions and the impact would remain significant  
23 and unavoidable. Therefore Impact AQ-4 would result in a disproportionately  
24 high and adverse effect on minority and low-income populations.

- 25 • **Impact AQ-6** - Project construction would result in significant residential cancer  
26 and acute residential and occupational health risk impacts at receptors near the  
27 Project boundary. The peak residential impact occurs at the liveboards directly  
28 to the south of the proposed Project within Census Tract 2961. The maximum  
29 occupational impact occurs at a marine fueling station (currently operated by  
30 ExxonMobil/General Petroleum) directly north of the Project site, which is also  
31 within Census Tract 2961. Census Tract 2961 is comprised of low income and  
32 minority population groups; therefore, the proposed Project would result in a  
33 disproportionately high and adverse effect on minority and low-income  
34 populations.

35 **Mitigation Measures – MM AQ-1 through MM AQ-6**

36 **Determination After Mitigation** – Mitigation measures MM AQ-1 through MM  
37 AQ-6 would reduce potential cancer risk air quality and health risk impacts  
38 associated with construction, however the impacts would remain significant for  
39 the area within 492 feet southwest of the Project boundary in Census Tract 2961,  
40 which includes the liveboards, and immediately to the north of the proposed  
41 Project, which includes the employees at the marine fueling station  
42 (ExxonMobil/GP site). Therefore, Impact AQ-6 would result in a  
43 disproportionately high and adverse effect on minority and low-income  
44 populations.

45 **Impact AQ-8** - Project construction would result in significant greenhouse gas  
46 (GHG) emissions impacts. However GHGs do not have localized impacts, the

1 effect of GHG emissions is realized on a global scale. GHGs would therefore not  
2 disproportionately affect minority and low-income populations because the effect  
3 of GHG emissions is global.

4 **Mitigation Measures** – MM AQ-7 through MM AQ-10

5 **Determination After Mitigation** – Emissions of GHGs would remain  
6 significant and unavoidable after mitigation, but impacts would not  
7 disproportionately affect minority and low-income populations.

- 8
- 9 • **Impact CUL-2** – Project construction would require the demolition of multiple  
10 structures on the site, two of which are historic structures: the Office and  
11 Workshop and the Machine Shop. Because these buildings qualify as historical  
12 resources as defined by CEQA and may qualify for listing as a City of Los  
13 Angeles HCM, the demolition would represent a significant impact to an historic  
14 resource. The buildings are potentially historic given direct association with  
15 events that have made a significant contribution to the broad patterns of  
16 California’s history (the diesel engine) and cultural heritage (fishing, tugboat, and  
17 yachting industries). Further the Machine Shop embodies the distinctive  
18 characteristics of the maritime industrial building type, the mid-twentieth century  
19 period, from the late 1930s until the late 1950s, and West Coast region. This loss  
20 of historic resources would not disproportionately affect the low-income and  
21 minority populations within one mile of the proposed Project site.

22 **Mitigation Measures** – MM CUL-2 and MM CUL-3

23 **Determination After Mitigation** – Impacts on historical resources would remain  
24 significant and unavoidable after mitigation, but impacts would not  
25 disproportionately affect minority and low-income populations.

- 26 • **Impact NOS-1** – Temporary noise generated during certain construction  
27 activities would have unavoidable significant impacts on sensitive receptors in  
28 Fish Harbor (dredging and pile driving) and Reservation Point (pile driving).  
29 This impact would affect residents in Census Tract 2961 which is comprised of  
30 low income and minority population groups. Therefore, the temporary  
31 construction noise impacts would cause disproportionately high and adverse  
32 effects on minority and low-income populations.

33 **Mitigation Measures** – MM NOS-1 through MM NOS-3

34 **Determination After Mitigation** – Mitigation measures would reduce potential  
35 noise impacts associated with construction, however impacts after mitigation  
36 would remain significant and unavoidable. Therefore Impact NOS-1 of the  
37 proposed Project would result in a disproportionately high and adverse effect on  
38 minority and low-income populations.

## 39 4.5 Public Outreach

40 CEQA requires that all state and local government agencies consider the environmental  
41 consequences of projects over which they have discretionary authority before taking  
42 action on them. The purpose of this Draft EIR is to inform agencies and the public of  
43 significant environmental effects associated with the proposed Project, to describe and  
44 evaluate reasonable alternatives to the Project, and to propose mitigation measures that  
would avoid or reduce the significant effects of the proposed Project.

1 The LAHD has made considerable efforts to provide public outreach, beyond what is  
2 minimally required by the CEQA Guidelines. The Notice of Preparation/Initial Study  
3 (NOP/IS) and Draft EIR are presented at public meetings at locations and times  
4 convenient for the affected community.

5 Notification of document availability is extensive and utilizes a variety of media. CEQA  
6 notices are placed in several newspapers, including papers such as the Los Angeles  
7 Times, Daily Breeze, La Opinion, Sentinel, Long Beach Press Telegram, and  
8 Metropolitan News. Meeting notices are sent to all active community organizations and  
9 anyone who has requested to be on the LAHD CEQA mailing list. A free copy of  
10 documents is provided to community organizations.

11 The LAHD also consults with community groups through the Port Community Advisory  
12 Committee (PCAC), a special stakeholder advisory committee of the Los Angeles Board  
13 of Harbor Commissioners. This committee, which meets monthly, includes  
14 representatives from a number of community groups. The PCAC also has subcommittees  
15 and focus groups that address a broad range of environmental issues, including studies on  
16 those impacts that might result in disproportionate impacts on relevant populations.  
17 Greater detail regarding PCAC involvement and Port outreach is available in Appendix  
18 B.

#### 19 **4.5.1 Alternative Forms of Distribution**

20 The Draft EIR for this Project has been distributed directly to numerous agencies,  
21 organizations, and interested groups and persons for comment during the formal review  
22 period. The Draft EIR has also been made available for review at the LAHD,  
23 Environmental Management Division, and at three Los Angeles public library branches:  
24 Central, San Pedro, and Wilmington. In addition to the printed copies, the Draft EIR also  
25 is available at no cost on Compact Disk and in electronic format on the LAHD website at:

26 [http://www.portoflosangeles.org/environment\\_pn.htm](http://www.portoflosangeles.org/environment_pn.htm)

#### 27 **4.5.2 Spanish Translation**

28 With a large Hispanic population adjacent to the Port, meeting notifications and summary  
29 documents of major CEQA documents (such as a readers guide) will be provided in  
30 Spanish as well as English. The Readers Guide for this Draft EIR is available in a  
31 Spanish translation. The purpose is to assist Spanish-speaking members of the local  
32 community in understanding the purpose of the Draft EIR, project overview, project  
33 description, environmental impacts, alternatives to the proposed Project, areas of  
34 controversy, and issues to be resolved.

35 The LAHD also provides an interpreter at public meetings, where required, and publishes  
36 its regular community newsletter, *The Main Channel*, in both English and Spanish.

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