REGULAR COUNCIL MEETING JANUARY 9, 2025

The WILMAPCO Council meeting was held at WILMAPCO, 100 Discovery Boulevard, Suite 800, Newark, DE 19713 and virtually via Zoom.

1. CALL TO ORDER: Mr. Stephen O'Connor, Vice-Chair, called the meeting to order at 2:01 p.m.

2. ROLL CALL:

Members present:

Stephen O'Connor, representing Cecil County Executive, Adam Streight

Geoff Anderson, Maryland Department of Transportation Chief

Austin Gray, representing Pam Steinebach for DelDOT Acting Secretary of Transportation, Shanté Hastings

Cathy Smith, representing Delaware Transit Corporation Chief Officer, John Sisson

David Edgell, Office of State Planning and Delaware Governor's Appointee

Charuni Patibanda, New Castle County Department of Land Use Acting General Manager representing County Executive Marcus Henry.

Eric Thompson, Mayor of Elsmere, representing New Castle County Municipalities

Kelly Williams, City of Public Works Commissioner representing City of Wilmington Mayor, John Carnev

Members absent:

Charlestown Commissioner, Cecil County Municipalities

Guests, Observers:

Jamila Davey, Public
Anson Gock, DelDOT Planning
Mike Kaszyski, PAC Chair
Pam Keeney, DNREC
Shawn Kiernan, Maryland Department of Transportation
Sarah Lester, Cornerstone West, PAC Member
Tina Merrill, DNREC
Christian Willauer, Public

Staff members:

Dan Blevins, Principal Planner
Heather Dunigan, Principal Planner
Sharen Elcock, Executive Assistant
Elizabeth Espinal, Administrative Assistant
Dave Gula, Principal Planner
Bill Swiatek, Principal Planner
Jacob Thompson, Senior Planner
Dawn Voss, Outreach Coordinator
Tigist Zegeye, Executive Director

Minutes prepared by Elizabeth Espinal.

3. MINUTES:

ACTION: On motion by Mr. Eric Scott-Thompson seconded by Ms. Charuni Patibanda the Council approved the November 14, Council Meeting Minutes.

Motion passed. (01-09-25-01)

4. PUBLIC COMMENT PERIOD:

Ms. Jamila Davey, a resident of Wilmington's West Side, expressed concerns regarding the 4th Street Improvement Project, noting that it has not extended across I-95 to the West Side. She stated that this issue has been a major topic at community meetings, particularly within the 4th Street Visionary Community Group. Residents have consistently voiced concerns about traffic safety along the 4th Street corridor, as well as the 2nd Street and Lancaster corridors.

Ms. Davey acknowledged that discussions have taken place with DelDOT and that a subcommittee has been organized to address these concerns following a fatality in the area last fall. In response to this incident, residents exercised their right to petition for a traffic study in the affected corridor. She emphasized the community's confusion and frustration, questioning why these high-accident corridors have not been included in improvement plans despite clear safety concerns. She urged officials to address this issue and consider ways to include the West Side in future improvement efforts.

COUNCIL MEMBERS' AND DIRECTOR'S REPORT:

5. Chairperson's Report:

On behalf of the Council Chair, Mr. John Sisson, Ms. Cathy Smith reported that DTC will implement a service change on Monday, February 23rd. This change falls outside the usual biannual service adjustments and did not require public hearings, as it is exclusively focused on schedule improvements, running time adjustments, and on-time performance enhancements. Currently, on-time performance ranges between 68% and 71% statewide. To address this, traffic checks have been conducted to improve fixed-route services, particularly in the capital region. Additionally, the regular biannual service change will take place in May, coinciding with the statewide kickoff of the resort season. Further details on this implementation will be shared soon.

Council Member's Reports:

Mr. Austin Gray provided updates from DelDOT. The Long-Range Transportation Plan will soon be open for public comment and is currently under review by the Acting Secretary before its official publication.

At the February 26th Council on Transportation meeting, the prioritization process criteria will be reviewed. A significant update to the process is the shift to a 100% quantitative evaluation system. More details on this change will be provided in upcoming discussions.

Additionally, DelDOT has received grant funding for the prioritization process program, and the implementation of this initiative will commence soon. Anson is leading efforts in this area, and coordination with the MPOs will be an essential part of the process.

6. Executive Director's Report – Ms. Tigist Zegeye shared the following report:

- On November 14th, a workshop was held for the Kirkwood Highway Land Use and Transportation Plan to discuss draft recommendations. A final recommendation workshop is scheduled for February 24, 2025.
- On November 18th, the US202 Master Plan Monitoring Committee met.
- On November 19th, a workshop was held for the MD272 Corridor Transportation Plan.
- On December 2nd, staff participated in a walk tour for the Augustine Cut-Off Project.
- On December 4th, staff presented at the APA Delaware Conference.
- On December 10th, the Churchman's Crossing Monitoring Committee held a meeting.
- On December 11th, staff participated in the Delaware Winter Freight Summit.
- On December 11th, The MD272 Corridor Transportation Plan Steering Committee met.
- On December 12th, staff participated in the Brandywine River Flood Study Workshop
- On December 17th, staff presented the Inter-Regional Report to the Baltimore Metropolitan Council at their board meeting.
- On January 6th, the Ardens Transportation Plan Monitoring Committee met.
- On January 9th, Staff met with Claymont business leaders and the fire department.
- On January 16th, the Route 9 Master Plan Monitoring Committee will meet.
- On January 27th, the East Elkton Plan Monitoring Committee will meet.
- On February 10th, the Rocky Run Underpass Public Workshop is scheduled.
- On February 20th, staff will participate in the Downes Elementary School Family Night.
- Staff continue to coordinate with DVRPC on the Regional Comprehensive Climate Action Plan for the Philadelphia MSA.

Ms. Tigist Zegeye reported that the Financial Report indicates approximately 44% of the budget has been expended.

Regarding the UPWP, an FY 2026 project request will be issued soon, with implementation set to begin in the next fiscal year. Member agencies can expect to receive a formal letter from WILMAPCO.

Additionally, the Audit Report is now available for member agencies. The report found no findings in financial statements, federal awards, or any other areas from the previous fiscal year.

7. Public Advisory Committee (PAC) Report:

Mr. Mike Kaszyski reported that PAC met on Monday December 16 and a few individuals attended the meeting in person, while others participated online. Without reaching a quorum the meeting commenced with the Director's report, Ms. Zegeye provided updates from the previous Council meeting, staff activities and WILMAPCO meetings. No questions were raised by PAC members following these announcements.

Two presentations were reviewed during the meeting. The first focused on the Newport River Trail, presented by Marco Boyce from New Castle County Public Works and Mike Campbell from WRA, the project consultant. The presentation covered the project's planning, design, and construction timeline. PAC members expressed strong support for the initiative and inquired about project details, construction scheduling, and necessary permits.

Ms. Dunigan then provided an update on the Claymont Area Master Plan, a joint effort incorporating the Governor Printz and Philadelphia Pike studies, which is now in its final stages.

She shared the outcomes of the final public workshop held at the Claymont Fire Hall on October 28, including land-use guidelines, strategies to address community concerns, and plans to enhance neighborhood transportation connectivity. While the community has expressed general support for the plan's safety improvements, there remain questions regarding the proposed roundabout. An article published had incorrectly suggested full community support for the roundabout, whereas discussions are ongoing regarding its feasibility.

PAC members raised questions regarding the traffic level of service methodology used in the plan, the integration of bike lanes with pedestrian improvements, and other plan details.

8. Technical Advisory Committee (TAC) Report:

Ms. Heather Dunigan reported that the November 21st TAC agenda included presentations on the Newport River Trail, the Maryland 272 Corridor Transportation Plan development, and the Environmental and Transportation Justice Analysis. No action items were addressed during this meeting.

At the December 19th meeting, the TAC took one action, recommending an amendment to the Cecil County element of the TIP to include funding for right-of-way acquisition for the Cecil County Transit Hub project. Additionally, presentations were given by Geoff Anderson of MDOT and Anson Gock of DelDOT, who provided insights into their respective project prioritization processes.

ACTION ITEMS:

9. To Amend the FY 2025-2028 Transportation Improvement Program (TIP).

Ms. Heather Dunigan reported on an amendment request submitted to WILMAPCO by MDOT regarding an existing project in the Cecil County TIP, the Cecil County Mid-County Transit Hub.

This project has been part of the TIP for several years and aims to establish a centralized hub to facilitate efficient transfers and services for Cecil County's Office of Transit operations. The amendment proposes an addition of \$1 million in right-of-way funding. The project has progressed through the design phase, and the final location has been determined, enabling Cecil County to proceed with transferring the necessary property. This funding would utilize federal 5307 funds with a local match to advance the project.

Mr. O'Connor commented that interest remains strong in seeing the transit hub come to fruition. He described the experience as a challenging endeavor but expressed optimism now that funding has been secured to purchase the necessary property.

ACTION: On motion by Ms. Catherine Smith and seconded by Ms. Kelly Williams the Council approved the request to amend the TIP.

Motion passed. (01-09-25–02)

PRESENTATIONS:

10. Maryland CTP Project Prioritization Process

Mr. Geoff Anderson provided an overview of the ongoing effort to update the Chapter 30 process, which has been in place since 2017. He explained that the revisions aim to address recommendations from the Maryland Transportation Commission and align with Governor

Moore's directive to adopt a "data-driven and heart-led" approach. This strategy seeks to prioritize projects based on state goals and ensure that funding decisions are guided by robust data analysis.

Mr. Anderson noted that the original Chapter 30 process, as established by the legislature in 2017, was highly prescriptive, specifying exact measures and methodologies for project selection. This rigidity has resulted in limited flexibility and transparency, making it difficult for stakeholders to understand how projects are ranked and funded. Furthermore, the process has undergone minimal updates over the past two decades, highlighting the need for modernization. The proposed revisions aim to prioritize transportation projects that align with state objectives, maximize value, and promote transparency. The updated process also seeks to enhance accessibility for stakeholders and better integrate with broader state planning efforts.

Mr. Anderson emphasized the importance of aligning transportation investments with the values outlined in the Maryland Long-Range Transportation Plan. Projects will be evaluated based on measurable outcomes, such as improvements in safety (e.g., reductions in fatalities and serious injuries), ensuring that criteria are both data-driven and aligned with state goals.

A recent \$2 million federal grant, which required no state match, will be used to enhance public access to the process. This funding will support the development of a dynamic user interface, allowing the public to access project information, view maps, track progress, and provide feedback. The revised process will apply to surface transportation projects, including roads, public transit, and biking, but will exclude projects related to ports, airports, or maintenance activities such as road resurfacing or bridge redecking. Eligible projects must increase capacity and have a minimum budget of \$5 million.

Under the updated process, MPOs and locally operated transit systems will join county governments, municipalities, and state agencies as eligible entities for project submissions. Application limits will be based on the size of the entity or the population served to ensure feasibility and alignment with available funding.

Mr. Anderson explained that the prioritization process will transition from an annual to a biennial cycle. This shift allows for the pooling of funds across two years, enabling consideration of larger, more impactful projects. During the off years, MDOT will evaluate the process, incorporating stakeholder feedback, new data, and improved analytical techniques.

Additionally, a new portal will be developed to standardize the submission of local priority letters. This portal will ensure consistency in format while allowing for freeform narratives to address broader issues. The revised process will apply to discretionary funding sources such as CMAQ and LOTS funding, while programs governed by specific legislative or federal allocation methods will remain unchanged.

Mr. Anderson underscored that the updated Chapter 30 process is designed to enhance transparency, improve public engagement, and ensure that project evaluations are data-driven and aligned with state goals.

Mr. Geoff Anderson outlined a three-step process for transitioning a submitted project from prioritization to funding within CTP. He mentioned that projects are submitted and scored based on measures aligned with key values such as safety, accessibility, mobility, climate impact, social equity, and economic competitiveness. The score reflects a project's benefits relative to its cost. Once scored, projects are ranked, and a preliminary list of fundable projects is

generated based on available funding. The ranked list is published for public review during the CTP tour and other forums. Input gathered during this phase may lead to adjustments to project rankings, which are made by the MDOT Secretary. Adjustments consider factors like public feedback, geographic equity, and specific priorities such as safety. The adjusted rankings are finalized and presented at a public forum, with rationales provided for any changes. The list of projects slated for funding is then included in the CTP submitted to the General Assembly.

Mr. Stephen O'Connor inquired about the expansion of application eligibility beyond political units such as counties and towns to potentially include MPOs. He also sought clarification on whether applications would be assessed based on the population served. He referenced Cecil County as an example, questioning whether multiple applications from different counties would be evaluated using the same population-based criteria. In response, Mr. Geoff Anderson clarified that both entities, counties and MPOs would be eligible to submit applications. For multi-state MPOs, the evaluation would consider only the Maryland population.

Mr. O'Connor also questioned the potential impact of transitioning from an annual to a biennial application cycle. He expressed concerns that this change might further prolong an already lengthy process, which often takes five to ten years for a road project to progress from inception to completion. He noted that while those familiar with the system understand the complexities, the public may not fully grasp why infrastructure projects take so long to materialize.

Mr. Anderson acknowledged these concerns and explained that one of the key reforms under consideration is ensuring that selected projects receive full funding through construction. Under the current system, some projects enter the CTP with funding allocated only for preliminary phases, such as design or right-of-way acquisition. This can lead to delays, as projects may stall due to funding gaps or the need to secure additional financial resources before progressing further.

By shifting to a biennial cycle and programming full project funding into the CTP from the outset, the goal is to enhance efficiency and reduce project disruptions. This approach aims to maintain adherence to budgets and delivery timelines, ensuring greater accountability. Mr. Anderson also emphasized that most projects take time to develop, from identifying initial issues to conducting feasibility studies, and that a biennial cycle should not result in significant delays for newly initiated projects.

Additionally, Mr. Anderson acknowledged that while the proposed changes represent the most control available within the existing framework, external factors such as revenue fluctuations and unforeseen cost increases could still impact project timelines. He noted that some projects currently included in the CTP have been deferred due to lower-than-expected revenue or higher-than-anticipated costs. While the revised funding approach does not entirely mitigate these risks, it represents a step toward improving project stability within the constraints of available resources.

Mr. Anderson provided an in-depth overview of the scoring measures used such as safety which evaluates reductions in fatalities and serious injuries before and after project implementation. This measure accounts for crash modification factors and roadway usage to normalize results. Accessibility and mobility adding improved access to jobs and increased use of non-single-occupant vehicles. Climate Environmental changes measures reductions in greenhouse gas emissions and criteria pollutants. The latter is applied only in areas of non-attainment or maintenance. Social equity focuses on increased job access and safety improvements for

disadvantaged communities within the project study area. Economic competitiveness includes reductions in the number of person/hours of delay and increases in land productivity. It also evaluates how projects support sustainable development patterns to reduce stress on the transportation system. Lastly, all projects are ranked by their overall scores, which are normalized by cost to prioritize cost-effective solutions.

Mr. Anderson emphasized that the process relies on robust data analysis. For instance, safety measures incorporate historical data on crashes, fatalities, and injuries, and estimate reductions based on proposed design interventions or shifts in travel modes (e.g., transit projects reducing roadway travel).

Mr. Anderson shared a yearly timeline which MDOT is launching this process as a pilot initiative in the current fiscal year. In January, the electronic portal for project submissions opens. Guidance materials, including a user manual, are provided online. By February, the portal closes mid-month. Scoring and review of submitted projects begin giving MDOT a few months to evaluate. In May, local priority letters are integrated with project scores to finalize a draft ranked list. From September through November, public input is gathered during the CTP tour, and adjustments are made if necessary. In December, any adjustments are announced in preparation for the next application cycle. Lastly, in January the portal reopens for new submissions.

Mr. Anderson concluded that although no funding is currently allocated for new capacity projects, the pilot year aims to refine the process and prepare for future funding opportunities. MDOT encourages stakeholders to submit projects, providing an opportunity to test the system, ensure data readiness, and receive valuable feedback.

11. DelDOT CTP Project Prioritization Process

Mr. Anson Gock, representing DelDOT Planning, presented the latest proposed version of Delaware's CTP project prioritization process. As customary with DelDOT presentations, he began with the department's motto, emphasizing their guiding principle: "Transportation excellence, every trip, every mile, every dollar, everyone."

Mr. Gock provided an overview of Delaware's safety performances, highlighting areas for improvement despite some positive trends in recent years. Motorcyclist accidents remain a significant concern, and he underscored the need for continued efforts to enhance safety across the state's transportation network.

Mr. Gock introduced the updates to the project prioritization process, noting that the revisions have been under development throughout 2024 and are planned for implementation in 2025. He acknowledged similarities between Delaware's and Maryland's approaches, as state DOTs often adopt similar methodologies, though Delaware's processes incorporate unique adjustments.

DelDOT has collaborated closely with the Council on Transportation (COT) over a series of meetings since February to refine project submissions and review proposed adjustments. The updates reflect modifications to categories such as safety, system operations, multimodal accessibility, economic development, equity, and environmental justice.

Key Changes to Prioritization Categories:

 Safety measures have been revised to include both the crash index and critical crash ratio, which normalize crash data based on roadway classifications. DelDOT's safety

- group has also incorporated rankings from the Highway Safety Improvement Program (HSIP), with projects receiving points based on their placement in this rigorous annual assessment.
- System operations now factor in recent congestion studies, intersection analyses, and TIS. These evaluations consider household growth, building permits, and census data over a three-to-four-year period, with findings integrated using GIS tools.
- Multimodal evaluation has transitioned from qualitative to fully quantitative measures.
 DelDOT has refined tools for active transportation and accessibility projects,
 including the incorporation of EPA's construction inspection application for ADA related deficiencies. Bicycle, pedestrian, and bridge access are now key components
 of the evaluation.
- Economic impacts are assessed using the TREDIS/REMI model, with considerations varying by county due to differing population and economic conditions. TIDs are also integrated into evaluations, factoring in contributions from private developers.
- Projects located in approved freight corridors receive additional weight. This category, informed by the state's freight plan, reflects the growing importance of freight transportation in national and state infrastructure planning.
- DelDOT has established equity focus areas, prioritizing projects in regions with high percentages of disadvantaged populations or significant social and health-related challenges. Environmental considerations include flood risk assessments based on statewide resiliency maps.
- Projects are evaluated against Delaware's State Strategies for Policies and Spending, with higher scores assigned to those in levels 1 or 2 investment areas. Local MPO priorities are also incorporated.

Mr. Gock highlighted efforts to enhance the transparency and effectiveness of the CTP process, including transitioning to fully quantitative data evaluations. Utilizing updated tools and methodologies, including GIS and economic models. Securing a federal grant to improve public engagement through an enhanced user interface for accessing project information and providing feedback.

Mr. Gock explained that the updated prioritization process will follow a biannual cycle. In January, the portal for project submissions will open, accompanied by the distribution of guidance materials. By mid-February, the portal will close, and the scoring and review of projects will begin. In May, local priority letters will be integrated with project scores, and potential changes may be implemented. Between September and November, public outreach efforts, including TIP/CTP workshops, will gather feedback and inform necessary adjustments. By December, final adjustments will be announced in preparation for the next application cycle.

Additionally, the COT will review and approve the updated process by February, facilitating its implementation in the 2025 CTP cycle. Mr. Gock emphasized DelDOT's commitment to making data-driven and transparent decisions that align with state goals. While no new funding is currently allocated for capacity projects, the pilot year will allow for testing and refining the updated process. Stakeholders are encouraged to submit projects to ensure data readiness and gather valuable feedback.

12. Environmental and Transportation Justice Analysis

Mr. Bill Swiatek provided an update on the Transportation Justice Analysis that WILMAPCO has been developing. The analysis aims to meet and exceed Title VI requirements by assessing equity for low-income and racial and ethnic minority populations. Additionally, it includes

components related to the Language Assistance Plan, an ADA self-evaluation, and transportation accessibility for mobility-challenged groups. These groups include seniors, individuals with disabilities, residents of households without vehicles, and, for the first time this year, young people. The current update focuses on the mobility-challenged aspect of the analysis.

Mr. Swiatek reviewed survey results from a public opinion survey conducted a few years ago, which explored how transportation access affects different populations. One key finding was that 9% of the general population reported that limited transportation access hindered their ability to reach healthy and affordable grocery stores. However, this figure rose to 35% among individuals in carless households. Among seniors, transportation barriers were like the general population, but for individuals with disabilities, the rate doubled to 17%. A similar trend was observed regarding access to routine medical care, with 20% of individuals in carless households reporting difficulty, compared to the regional average of 9%. Further survey results showed strong regional support (71%) for revitalizing existing communities and downtown areas. However, seniors were slightly less likely to prioritize this issue compared to other groups. The spatial analysis framework for mobility-challenged groups is like the methodology used for analyzing low-income and racial minority populations. The study categorized the population into seniors (65+), individuals with disabilities, carless households, and youth (ages 5–19). The analysis trimmed out non-residential areas to provide a clearer picture of population concentrations.

Findings indicated that concentrations of seniors appear south of the C&D Canal and northwest of Wilmington. Households with at least one disabled member were mapped at the block level to provide a more precise assessment of need. The distribution of car-less households was more pronounced in Wilmington but also extended along major corridors outside the city. Youth populations were also analyzed for their transportation needs as emerging users of the system.

The spatial analysis informs project prioritization, ensuring that transportation projects in mobility-challenged neighborhoods receive additional consideration. Areas with moderate or significant concentrations of these populations are identified, allowing for a targeted approach to improving transportation equity.

Mr. Swiatek further explained that a separate component of the analysis focuses on language assistance for individuals with limited English proficiency (LEP). The study uses census data to identify populations that self-report speaking English "less than very well." Additionally, it incorporates a proxy measure for low literacy (individuals with less than a ninth-grade education) and assesses digital access limitations based on previous research on technology deserts.

The study is required to comply with the Safe Harbor Provision, ensuring reasonable interpretation, translation, and outreach for LEP communities. While no single language group exceeds the 5% regional threshold, Spanish and Chinese-speaking populations surpass the 1,000-person threshold, necessitating additional language services.

The geographic distribution of LEP populations shows concentrations of Spanish-speaking individuals in central northern New Castle County, Middletown, and Rising Sun. Chinese-speaking clusters appear in suburban areas around Newark. Additional clusters of Haitian Creole and Arabic speakers have been identified near Newark and Wilmington. For literacy and digital access, the study maps populations with low educational attainment and households

without computer or internet access. While digital access has generally improved, some pockets with limited technology remain.

Mr. Swiatek emphasized that to ensure equitable communication, WILMAPCO continues to implement a tiered outreach plan:

- Tier 1 (Most Support): Proactive outreach for Spanish-speaking LEP population, low literacy, and digitally limited clusters. This includes translated materials, partnerships with local institutions, and in-person language assistance.
- Tier 2 (Moderate Support): Targeted outreach for Chinese-speaking LEP population clusters.
- Tier 3 (Responsive Support): Translation and assistance provided upon request for other language groups.

Studies conducted in low-literacy or limited-digital areas must incorporate visual and oral communication methods, rather than relying solely on written materials. Similarly, outreach in technology-limited communities should supplement digital engagement with low-tech alternatives.

Mr. Swiatek concluded the presentation with next steps highlighting a complete connectivity analysis and integrating the findings into future updates. The CADSR at the University of Delaware is conducting a connectivity analysis to evaluate household access to key destinations across the region. Equity-focused assessments are also in progress. The final report is expected to be endorsed by the Council in September 2025.

Mr. Stephen O'Connor expressed anticipation for the final project outcome.

Ms. Jamila Davey inquired whether information regarding EJ neighborhood designations would be publicly available. She also questioned whether the proximity of transportation projects to highways is considered in the decision-making process. Mr. Swiatek confirmed that the data is publicly accessible. He directed interested parties to an interactive map available on the organization's website <a href="https://www.wieners.com/wieners/wie

Ms. Davey further noted the absence of greenhouse gas reduction criteria in the prior DelDOT prioritization presentation. She highlighted that many EJ neighborhoods are located near highways and asked whether environmental exposure to transportation-related emissions is considered in project assessments.

Mr. Swiatek responded that environmental exposure is analyzed through traffic volume assessments, which show that EJ neighborhoods generally experience higher traffic levels than the average community. He explained that it is also accounted for in the WILMAPCO project prioritization process, as expansion projects that increase vehicle miles traveled (VMT) and emissions are penalized by deducting points, whereas projects that benefit the environment, such as transit or bike-pedestrian initiatives, are awarded additional points. He provided a link: WILMAPCO.org/priority where the prioritization criteria are outlined.

Mr. Gock added that while his presentation did not specify the details, various projects are assessed under different environmental impact programs. He referenced the Carbon Reduction

Program, which evaluates the rate of emission reductions, and other initiatives that focus on specific environmental assessments.

INFORMATION ITEMS:

13. DelDOT's Administrative Modification Request Letters

ADJOURNMENT:

Meeting adjourned at 3:25 p.m.

ATTACHMENTS: (0)