

RAC 1 Member Feedback on WUI Definition and FIS Received Through 8-13-21  
Compiled by Sam Imperati, Facilitator

**Section One: WUI Definition Comments**

**August 12, 2021**

**To: Tim Holschbach, ODF and Sam Imperati, ICM Resolutions**

**From: Mary Kyle McCurdy, 1000 Friends of Oregon**

**Re: SB 762 Rules Advisory Committee #1: WUI**

**Homework following RAC 3<sup>rd</sup> meeting – WUI definition**

1000 Friends of Oregon supports use of the International Wildland-Urban Interface definition (IWUI), without change: *“That geographical area where structures and other human development meets or intermingles with wildland or vegetative fuels.”*

We support this definition for the following reasons:

- SB 762, Section 33, requires that in defining the WUI, the Board of Forestry “consider[] national best practices.” Use of the International WUI definition meets that criterion. As noted in the presentations by the ODF and in examples we provided in our follow-up to the second RAC meeting, this definition is used by most western states, at the state or local level, as the basis for an array of voluntary programs, regulatory structures, preventative actions, public health interventions, incentives, and/or other actions.
- Oregon’s WUI definition should be consistent with the definition broadly relied upon, including by fire professionals, federal agencies, other western states, the Council of Western State Foresters, and scientists. Among other things, a nationally recognized definition both allows better coordination across various jurisdictional boundaries and better positions Oregon for federal funding and funding from other sources.
- The IWUI is scientifically-sound, in that it includes intermingled areas and both dwellings and structures.
- It is appropriate at this stage – which is simply defining the WUI - to use an inclusive definition. Among other things, later stages of implementing SB 762 will include policy and investment decisions about how to ensure our communities are more wildfire resilient and all Oregonians are safer from wildfire. Interventions will not be only regulatory, as some seem to fear, but they will also include investments, subsidies, determinations about where to place life-saving equipment and fire-fighting resources, actions by the Oregon Conservation Corps, placement of wildfire smoke shelters, and more. We should not artificially exclude areas now, an action that could result in actually harming Oregonians. The SB 762 implementation process allows for taking specific characteristics into account later.

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August 13, 2021

**TO:** Sam Imperati, ICM Resolutions  
Tim Holschbach, Oregon Department of Forestry  
**FROM:** Jon Jinings, Community Services Specialist  
Sadie Carney, Policy Analyst & Communications Manager  
**SUBJECT:** DLCDC Recommendations for RAC 1 Goal Statement and Wildland-Urban Interface definition

Greetings,

Please see below for the department's position on the Wildland-Urban Interface Definition and Fiscal Impact Statement Issues.

Feel free to contact me with any questions. The department looks forward to discussing these items at the next RAC meeting scheduled for August 17, 2021.

**Concise explanation of your organization's position on the WUI definition issue; and/or**

DLCD supports using the International Wild-Land Urban Interface as proposed by the Oregon Department of Forestry.

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**ODF SB 762 RAC 1 Meeting Three**

**Participant: Leti Moretti**

**Representing: Latinx, Rural Health Center, Hood River County Planning Commission**

**Alternate: Jay Lyman, Hood River County Planning Commissioner**

**Meeting 3 Homework**

Concise explanation of your organization's position on the WUI definition issue.

I support the ODF proposal (International definition):

**“That geographical area where structures and other human development meets or intermingles with wildland vegetative fuels.”**

I support this definition because it aligns with international and Western state definitions and consistency helps with understanding.

Also, without first establishing definitions this definition it seems the most inclusive and I feel that will allow to consider farmworker housing.

Hood River County is mostly rural and our orchards and where our farmworkers live is surrounded by forest and vegetation fuels. Words like urban and suburban, to me, don't include farmworker housing.

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## Compiled by Sam Imperati, Facilitator

Lauren Smith, Association of Oregon Counties  
Holly Kerns, Association of Oregon County Planning Directors  
Jim McCauley, League of Oregon Cities

### Feedback on WUI Definition and Fiscal Impact Analysis

Association of Oregon Counties, the Association of Oregon County Planning Directors and League of Oregon Cities would like to thank you for the opportunity to be a part of the rules advisory committee (RAC) and provide feedback on the definition of Wildland Urban Interface (WUI) under SB 762 and the fiscal impact of the proposed WUI definition in rule.

#### Wildland Urban Interface Definition Feedback

Local governments recognize the need to protect our communities from wildfire and are committed to collaborating with state partners to build a better way. We are writing to raise our concerns that the definition being proposed by Oregon Department of Forestry (ODF) is overly broad and will have serious unintended consequences for our communities and needs to be amended before being put into rule. Rather than utilize the RAC to further flush out a definition of WUI, the agency has indicated an intent at our last rules advisory committee meeting to move forward with the definition that was previously rejected by the Oregon legislature, defining the WUI as “the geographic area in which structures or other human development meets or intermingles with wildland or vegetative fuels.” This definition is unnecessarily vague, and potentially includes all kinds of rural development that are clearly outside of any plain language understanding of what the terms "Wildland Urban Interface" mean. For example: utility cabinets, mountain top communications towers, irrigation infrastructure, and roads are clearly captured within the proposed definition of WUI as written, not to mention sparse rural development. We do not believe this is the intent at all, which underscores the reason that definition needs to start strong and be clear. If the definition is left unclear, we really have not defined anything at all.

As written, the ODF proposed definition of WUI is descriptive, but not definitive, which is inconsistent with the how the wildfire legislation has set up the term to be used. A vague definition that does not provide clarity for the reader as to what is or is not included in the WUI does not advance wildfire policy in Oregon; on the contrary, it sets an unstable foundation from which to build. As a basis for establishing defensible space application (Section 8 of SB 762), building code standards (Section 12 of SB 762), prioritization of funding for Oregon Conservation Corps Projects (Section 18 and 22 of SB 762), mutual aid decision making (Section 30a of SB 762), the basis for building criteria for classifying risk categories (Section 33 of SB 762), and qualifying membership on the State Wildfire Programs Advisory Council (Section 36 of SB 762), we see exceptional value in being clear as to what a WUI is.

Local governments would like to suggest a definition that provides more clarity as to what a WUI is. We would like to propose defining WUI as: ***"A wildland urban interface is that geographical area where a concentration of structures in an urban or suburban setting meets or intermingles with wildland vegetative fuels."***

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Mary Anne Cooper, Oregon Farm Bureau  
Dave Hunnicut, Oregon Property Owners Association  
Roger Beyer, Oregon Small Woodlands Association  
Mark Long, Oregon Homebuilders Association  
Amanda Astor, Association of Oregon Loggers

### Feedback on WUI Definition and Fiscal Impact Analysis

Thank you for the opportunity to provide feedback on the definition of Wildland Urban Interface (WUI) under SB 762 and the fiscal impact of the proposed rule. We appreciate the challenges in the conversation and agree that the WUI definition is critical to achieving the goals of SB 762. We all have a shared goal of increasing Oregon's fire resiliency and ensuring that we can protect our communities and our citizens from Oregon's growing wildfire risk. While we may differ in how to best achieve this goal, we want to reiterate that we are approaching these conversations with the goal of best facilitating the shared desire of everyone who supported SB 762 to protect our communities and our citizens. With that in mind, we encourage the Department to continue to work on refining the definition of the WUI to better tie it to the goals of the bill to and keep in mind the citizens that will need to understand these rules.

### Wildland Urban Interface Definition Feedback:

We are disappointed that the Oregon Department of Forestry has indicated an intent to move forward with a definition of WUI that is overly broad and creates a risk of confusion and overregulation in our rural communities. As you are aware, the definition of the WUI was the final subject of contention in SB 762. The legislature didn't have the votes to pass the bill with the broad definition of WUI that you are proposing, so a compromise was reached to push the issue to rulemaking. This compromise was essential to the bill's passage and to obtaining bipartisan support, including support from several of our groups.

Instead of undertaking this analysis, the agency indicated an intent at our last rules advisory committee meeting to move forward with the exact same overly broad definition the legislature rejected that would define the WUI as *"the geographic area in which structures or other human development meets or intermingles with wildland or vegetative fuels."* Given that the plain meaning of structures and other human development could include features outside of occupied buildings such as fences, trails, county roads, irrigation, and drainage infrastructure, and potentially even cropland, and would definitely include single homes on hundreds of acres, this definition would effectively include nearly all of rural Oregon and is contrary to the stated intent of legislators, who assured our organizations that the WUI would not be applied so broadly. It would also be contrary to the plain language of the term "wildland urban interface"—which plainly means the area where wildland areas interface (i.e., meet) urban areas.

While we understand that the definition comes from the International WUI Code, that body is made up solely of governmental entities, and the definition was not made with statewide regulatory systems in mind. Given that Oregon has a statewide regulatory system, it is essential that it is narrowly crafted and thoughtfully developed to align with existing Oregon law and policy. It is also worth noting that during the RAC meeting on this issue, all the members representing landowners and three local government representatives voted against this definition and the positive votes were from NGO's, enforcement agencies, and other government representatives who would not be negatively affected by a broad definition. However, some government entities, such as the fire service, expressed an interest in working toward consensus. A broad definition would only have overly negative impacts on property

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owners, it also fails to focus investments and other work mandated by SB 762, A broad definition simply is not in the best interest of the Department or Oregonians.

The definition proposed by ODF is not only contrary to their previous statutory charge, but it is also contrary to the definition used as recently as 2020 in the “Communities at Risk” report by ODF to the legislature, which focused on clustered or concentrated development at the urban interface.

The two primary reasons the agency has proposed appear to be an allegiance to the International WUI Code, and a false understanding that other states approach their regulation in this manner. As noted above, the International WUI Code was not developed with a diversity of stakeholders – as is the requirement for ODF rulemaking – and was developed for use and modification at the local level. Similarly, other states have not adopted the international WUI code for purposes of their regulatory program. The states that adopt the international WUI code definition into state regulations generally do not have a statewide regulatory system flowing from that definition, and the states who have a statewide wildfire program do not base their regulation solely on the International WUI definition.

If Oregon adopts this approach, we would be unique in having a statewide regulatory program flowing from this very broad WUI definition designed for local implementation and modification. This approach is contrary to the legislative directive to “consider” a definition based on national standards. Simply put, there is no state (or federal) program which would declare nearly the entirety of the state’s rural areas as “urban” or within the “interface” between urban and wildland.

We appreciate the assurances from the agency that this broad definition would be narrowed through the future adoption of criteria, and that the intent is that regulatory programs would only attach to high and extreme risk hazard designations (though the statute allows broader application). However, we cannot support an overly broad definition of WUI that is unworkable under Oregon’s system, with the promise that it *may* be narrowed in the future through the application of criteria. This is particularly true given that there does not appear to be consensus within the agency and the committee about what is intended to fall under the WUI definition and how much the definition will be modified through the application of criteria to make it workable.

We strongly urge you to reconsider the overly broad WUI definition and instead adopt a definition that focuses on the areas where a concentration of dwellings meet undeveloped wildland vegetation. This is the “donut hole” approach which staff has supported in the past, and best meets the goals of the legislation to regulate those areas at highest risk We have proposed several definitions based on current Oregon law, the 2020 report, and federal standards. We encourage you to consider these approaches and the previous work of the department.

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**OFIC (Kyle Williams) WUI definition position:**

We are challenged with adoption of the international code definition at this point in the discussion because of the undetermined and potentially broad meaning behind the words. My understanding based on the discussion in the workgroup is that timelines necessitate a reverse process wherein we adopt the statement “That geographical area where structures and other human development meets or intermingles with wildland vegetative fuels” and then define what each of the words mean in the next step. Please understand this is akin to a “trust me, it will all work itself out”. That is not a position we feel comfortable being in. I do however understand and would like to believe that is the intent. The primary concern is that downstream rule making/enforcement could utilize the very broad statement without adhering to the underlying and yet to be determined criteria. Not knowing exactly how the mechanics of the downstream processes will work creates a situation where we need to see something closer to the result in the upfront definition. IF adoption of the full international definition becomes the will of the board, rather than many of the more narrowed options that have been offered and discussed, it is critical to have an affirmative statement such as “as defined by criteria” or something to that effect attached to the definition.

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### Sustainable Northwest WUI Definition Preference

Sustainable Northwest's preferred WUI definition is the International WUI Code definition, with no changes: "That geographical area where structures and other human development meets or intermingles with wildland or vegetative fuels."

**IMPORTANT NOTE:** In the definition that has been presented to the RAC, an 'or' has been omitted between 'wildland' and 'vegetative fuels'. The actual International WUI Code definition includes this 'or' which is a critical component of the definition and its meaning.

Reasons to select this definition as written:

- Scientifically sound and comprehensive (includes both interface and intermix).
- Include structures, rather than just dwellings.
- International WUI Code is nationally recognized and used in application. Nearly every western state, and many more, have already adopted it.
- Recognized by the Council of Western State Foresters, federal agencies, and other government and professional bodies.
- Having a nationally recognized definition is important to ensure Oregon is eligible to secure federal funds for programs related to the WUI.
- We need consistency and clarity in the definition, not an Oregon specific definition that is not recognized broadly by scientists, fire managers, and government bodies. Customized issues can and should be addressed in the criteria process to account for unique circumstances and features.



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### The Nature Conservancy's WUI Definition Position

The Nature Conservancy supports the adoption of the International WUI Code definition of the Wildland Urban Interface as written: *"The geographical area where structures and other human development meets or intermingles with wildland or vegetative fuels."*

The following comments summarize several reasons for the state to adopt this definition in its entirety:

- The International WUI Code definition meets the charge of SB 762 to consider "national best practices", as this definition is widely utilized by varying types of jurisdictions across the American West, is recognized by scientists, land managers and the fire professionals who keep communities safe.
- Adopting a nationally recognized definition in its entirety avoids unintended consequences that could arise by creating a 'combo' model that merges other definitions or writing a new definition from scratch.
- The Intl. WUI Code definition provides sufficient direction and clarity while preserving space for the RAC to refine terms and classify the WUI in a way that authentically incorporates the nuances of Oregon's unique landscapes and communities.
- We appreciate that the application of the International WUI Code includes focus "to safeguard life and property from the intrusion of wildland fire and to prevent structure fires from spreading to wildland fuels". We find it meaningful that this model is grounded in creating resilient landscapes and communities to better ensure that those who live in impacted areas, and those who work to keep our communities safe from fire, remain front of mind in subsequent discussions.

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August 13, 2021

From: WELC

To: Oregon Department of Forestry

Wildland Urban Interface Rulemaking Advisory Committee

Re: WUI Definition Fiscal Impact Statement Perspectives

**Re: WUI Definition Recommendation**

Western Environmental Law Center proposes that ODF adopt the International WUI definition:  
“That geographical area where structures and other human development meets or intermingles with wildland **\*or\*** vegetative fuels.”

*\* It has come to our attention that the WUI definition originally displayed by ODF was missing a word. I have added it back in above, and recommend for the reasons described below, we adopt the actual international definition. [Link to original](#)<sup>1</sup>.*

Mitigation of wildfire is an increasingly international effort. Best practices are not just shared between US states, but between countries around the world. Fire fighters are increasingly working across state, and even international boundaries as they come to the assistance of regions in the midst of extreme fire. Consistency allows these fire-fighters to be more effective in their work when they know what to expect.

Additionally, the International definition has been forged in the context of long-considered research in the light of extensive trial and error. It has been adopted by nearly every western state in the US. Because Oregon is among the regions facing some of the worst fires globally, we may soon find real opportunities for innovation and improvement upon this baseline effort. But until we have a reasoned foundation on which to propose improvements, we should stand on the shoulders of others, not re-invent the wheel. Adopting the international definition will improve our ability to participate robustly in, and benefit from, the international effort to learn to better live with fire in the era of climate change.

Thank you for the opportunity to comment. Please feel free to contact me if you have any further questions or clarifications.

Best Regards,  
- Pam Hardy

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<sup>1</sup> <https://codes.iccsafe.org/content/IWUIC2018/chapter-2-definitions>

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### OSU

Oregon State University's position on the definition of the WUI would be using the International WUI code definition. The reasoning behind this is the wording of "structures and other human development meets or intermingles with wildland vegetative fuels" the phrasing of "intermingles" is missing from the poll top answers combined and therefore can eliminate certain types of landscapes.

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**Section Two: Fiscal Impact Statement Comments**

**August 12, 2021**

**To: Tim Holschbach, ODF and Sam Imperati, ICM Resolutions**

**From: Mary Kyle McCurdy, 1000 Friends of Oregon**

**Re: SB 762 Rules Advisory Committee #1: WUI**

**Homework following RAC 3<sup>rd</sup> meeting – Fiscal Impact Statement**

After the RAC discussion, particularly in our third meeting, 1000 Friends of Oregon recommends finding that there will be no fiscal impact associated with defining the wildland urban interface (WUI). At this stage, only the WUI definition is being adopted. It carries with it no regulatory or investment impacts. Those actions and their positive and/or negative fiscal impact on a variety of interests will flow from later definitions and other decisions whose outcome we do not know and therefore that we should not speculate about.

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**TO:** Sam Imperati, ICM Resolutions  
Tim Holschbach, Oregon Department of Forestry  
**FROM:** Jon Jinings, Community Services Specialist  
Sadie Carney, Policy Analyst & Communications Manager  
**SUBJECT:** DLCDC Recommendations for RAC 1 Goal Statement and Wildland-Urban Interface definition

Greetings,

Please see below for the department's position on the Wildland-Urban Interface Definition and Fiscal Impact Statement Issues.

Feel free to contact me with any questions. The department looks forward to discussing these items at the next RAC meeting scheduled for August 17, 2021.

**Concise explanation of your organization's position on the Fiscal Impact Statement issues.**

DLCD understands that a Fiscal Impact Statement is a legal requirement of the administrative rule making process. However, we do not believe it is necessary to spend an excess amount of the RAC's time on this issue because the definition, in of itself, does not establish or propose any regulatory arrangement.

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**ODF SB 762 RAC 1 Meeting Three**

**Participant: Leti Moretti**

**Representing: Latinx, Rural Health Center, Hood River County Planning Commission**

**Alternate: Jay Lyman, Hood River County Planning Commissioner**

**Meeting 3 Homework**

Concise explanation of your organization's position on the Fiscal Impact Statement issues.

I'm new to this work and I'm commenting as I'm learning more information on these subjects.

My concerns around fiscal impact come up when I think about:

- Easements and road dimensions for our firetrucks and other help to access and to evacuate people when there is a fire.
- Materials to build homes
- Density for housing (we have a terrible housing shortage and need to build homes that are affordable to the people who work in Hood River)

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Lauren Smith, Association of Oregon Counties  
Holly Kerns, Association of Oregon County Planning Directors  
Jim McCauley, League of Oregon Cities  
Feedback on WUI Definition and Fiscal Impact Analysis

Association of Oregon Counties, the Association of Oregon County Planning Directors and League of Oregon Cities would like to thank you for the opportunity to be a part of the rules advisory committee (RAC) and provide feedback on the definition of Wildland Urban Interface (WUI) under SB 762 and the fiscal impact of the proposed WUI definition in rule.

**Fiscal Impact Statement Feedback**

The agency has indicated that in their assessment, the rule as drafted does not have a fiscal impact. Local governments disagree and have not been provided the opportunity provided by the Oregon Administrative Procedures Act to analyze the potential fiscal impact this definition could have at the local level and provide that information to ODF. We believe that there is a likely fiscal impact of this definition, due to the vagueness of the definition as written that fiscal would most likely be indeterminate; however, it has the potential to be significant.

Thank you for the opportunity to provide feedback, and we look forward to continuing to engage around the implementation of SB 762.

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Mary Anne Cooper, Oregon Farm Bureau  
Dave Hunnicut, Oregon Property Owners Association  
Roger Beyer, Oregon Small Woodlands Association  
Mark Long, Oregon Homebuilders Association  
Amanda Astor, Association of Oregon Loggers

### Feedback on WUI Definition and Fiscal Impact Analysis

Thank you for the opportunity to provide feedback on the definition of Wildland Urban Interface (WUI) under SB 762 and the fiscal impact of the proposed rule. We appreciate the challenges in the conversation and agree that the WUI definition is critical to achieving the goals of SB 762. We all have a shared goal of increasing Oregon's fire resiliency and ensuring that we can protect our communities and our citizens from Oregon's growing wildfire risk. While we may differ in how to best achieve this goal, we want to reiterate that we are approaching these conversations with the goal of best facilitating the shared desire of everyone who supported SB 762 to protect our communities and our citizens. With that in mind, we encourage the Department to continue to work on refining the definition of the WUI to better tie it to the goals of the bill to and keep in mind the citizens that will need to understand these rules.

### Fiscal Impact Statement Feedback:

The agency stated an intent in the prior rulemaking to indicate that the rule does not have a fiscal impact. We believe that there is a likely fiscal impact of this definition, though we agree that the extent of the impacts will vary tremendously depending on whether and how the definition is refined through the application of criteria.

ORS 183.335(2)(b)(E) requires that agencies prepare a "statement of fiscal impact identifying state agencies, units of local government and the public that may be economically affected by the adoption, amendment or repeal of the rule and an estimate of that economic impact on state agencies, units of local government and the public." The statute states that in "considering the economic effect of the proposed action on the public, the agency shall utilize available information to project any significant economic effect of that action on businesses which shall include a cost of compliance effect on small businesses affected." If the agency finds that the rule will have an adverse effect on small businesses, it must also establish less costly or intrusive alternatives for small businesses. ORS 183.540.

In this case, an overly broad definition of the WUI runs the risk of having substantial consequences on small businesses, particularly farmers, ranchers, small woodland owners, and other rural businesses who could be subjected to requirements for roads, fences, on farm housing, food processing facilities, and other structures due to an overly broad application of the WUI. We also agree that the rule could have a positive impact on businesses if it is refined appropriately to focus on reduction of wildfire risk at the urban/wildland nexus. The fiscal impact statement must acknowledge both potential outcomes, and the consequences of each. The fiscal impact statement must also evaluate whether ODF can adopt a narrower definition of WUI that would avoid the negative impacts of an unrestricted overly broad definition to small businesses while still achieving the goals of the legislation.

We understand this is work for programs and want to continue to help craft a definition that aligns with Oregon law and policy, and reflects Oregon's unique statewide regulatory system and will help all citizens understand that best to mitigate the impacts of wildfire



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At the very least, we ask that you incorporate language into the definition that aligns with your 2020 report. Thank you for the opportunity to provide feedback, and we look forward to continuing to engage around the implementation of SB 762.

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**OFIC (Kyle Williams) FIS Statement**

Given that we are working off the understanding that the definition is hollow until filled in later with criteria I understand the logic leading to a finding of “no fiscal impact”. However, clearly the intent of the definition is to create future workload and regulation. Given this iron clad outcome of the work, it appears that a finding of “indeterminate” at the very least would be more appropriate than “none”.

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**Sustainable Northwest WUI Fiscal Position**

Sustainable Northwest believes that there should be no fiscal impact associated with the definition of the WUI. The definition in and of itself establishes no practice changes, regulatory/compliance impacts, or other requirements or changes in behavior. There should therefore be no financial impacts.

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### The Nature Conservancy's WUI Definition Fiscal Position

We found helpful the clarification offered in the third meeting of RAC 1 that the committee's charge is to discuss the fiscal impact resulting from the selection of a definition only, with future discussion to come on potential fiscal impacts of subsequent refinement of terms and classification of the WUI. With that important detail in mind, we do not believe the definition itself creates any fiscal impact. The words themselves do not require subsequent action.

Therefore The Nature Conservancy's position is that there is no fiscal impact from choosing a definition for the term "Wildland Urban Interface".

We continue to believe that further fiscal discussion is better suited for later rulemaking related to SB 762, when policy decisions will be made regarding the application of the WUI may create financial impacts - positive or negative. This RAC cannot, and should not, evaluate the potential impacts of those later decisions because we do not know how they will play out, and we should not presume the outcomes of future committee discussions.

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August 13, 2021

From: WELC

To: Oregon Department of Forestry

Wildland Urban Interface Rulemaking Advisory Committee

Re: WUI Definition Fiscal Impact Statement Perspectives

The Western Environmental Law Center proposes the following perspective when drafting the fiscal impact statement for the definition of the Wildland Urban Interface.

The fiscal impact statement should emphasize that the fiscal impact of the definition is indeterminate. Short term effects depend upon the criteria for inclusion which have yet to be determined. Long term effects are likely to be very positive, but mostly in costs avoided. In other words, if done correctly, a good WUI definition will facilitate an implementation of effective policies that will reduce the number of lives lost and homes, businesses, and whole towns, burned in future wildfires. Additionally, good WUI practices will aid wildland fire fighters in their ability to fight *wildland* fire, and spend less time concerned about isolated, poorly protected homes and other structures. This will improve the health and longevity of the extensive forests that are dear to the hearts of Oregonians.

*Both* long- and short-term, positive and negative, impacts should be addressed in the fiscal impact statement.

Thank you for the opportunity to comment. Please feel free to contact me if you have any further questions or clarifications.

Best Regards,  
- Pam Hardy