



## 6. FUTURE NEEDS & DEFICIENCIES

### 6.1 Introduction

Once goals and objectives have been established, a correct understanding of regional characteristics summarized, and current transportation system conditions inventoried, the deficiencies of the transportation system become apparent. Recently, much time, money and effort has been focussed on studies to identify and address these system needs. This chapter begins with a brief summary of the recent studies. It then reviews anticipated infrastructure deficiencies, particularly on the highway and bridge networks. Finally, the chapter includes possible future scenarios and the potential impact of these scenarios on the transportation system.

The chapter reflects the shift of attention for the future from the major construction work associated with I-86 to the maintenance and management of existing infrastructure. By drawing from recently completed studies and the data presented in the previous chapter, this discussion demonstrates how the region will have to invest in a variety of improvements to its roads and bridges, its transit system, and to complementary facilities such as trails for biking and walking.

### 6.2 Findings from Recent Studies

#### 6.2.1 HIGHWAY, BRIDGE, TRAFFIC

##### 6.2.1.1 City of Elmira Highway Network Evaluation (2001)

The primary objectives of the City of Elmira Highway Network Evaluation were to identify deficiencies in safety and mobility conditions among modes and to develop feasible alternative solutions for improvement. The report includes short, intermediate and long-term recommendations related to deficiencies in:

- Roadway Links (e.g. pavement conditions, centerline striping)

- Intersections (e.g. approach lanes, signal timings/coordination)
- Signs (e.g. parking restriction signs, faded STOP signs)
- Transit (e.g. existing bus stops that do not meeting accessibility standards)
- Pedestrian/Bicycle Facilities (e.g. need for on-street bicycle facilities linking the Lackawanna Trail from Church/Madison to Eldridge Park)
- Safety (e.g. intersections, roadway links)
- Truck Routings (e.g. the maintenance of a 1996 truck routing scheme to keep trucks off local streets and direct them to proper routes to/from future development)

The study showed that no major highway network deficiencies were present in Elmira. It also included GIS data, which continues to provide the basis for future system-wide updates. With this study and underlying data, city staff can continue to manage ongoing needs.

##### 6.2.1.2 Big Flats-Horseheads Highway Network Evaluation Study (1999)

The purpose of the Big Flats-Horseheads Highway Network Evaluation Study was to evaluate highway needs in the area, determine the impact of designating NYS Route 17 as I-86, and evaluate local access to and through the Hamlet of Big Flats. The municipalities also sought to develop a funding mechanism that would assure improvements were made in a timely fashion.

The report found traffic operations to be generally acceptable. However, there was a significant potential for 7.7 million square feet of land to be developed in the study area, which could cause the area to experience congestion and delay.



The 2000 Big Flats-Horseheads Highway Network Evaluation Study identified approximately twenty locations that could become problem areas over the twenty-year period covered by this LRP. The study recommends solutions to address highway needs in the study area, including the reconstruction of intersections and roadways and the construction of new roadways. One major recommendation, a new interchange of I-86 with Kahler Road, has already been completed. The total cost of improvements was estimated as \$16.9 million.

### 6.2.1.3 Alternative Route Evaluation for Elmira Arterial Northern Section (1993)

The Alternative Route Evaluation for the northern section of the Elmira Arterial states that there is a need to relieve congestion, remove truck traffic from local streets, provide an improved route through Downtown Elmira, and spur economic growth. The report references previous studies that recommend an arterial-type facility, and states that, since the southern and central portions of the arterial have been constructed, a northern section should be constructed to realize full potential of the arterial concept.

The report recognizes five alternatives for the Northern Arterial, three of which are recommended for further study:

- Alternative B leads north then east from the present terminus of the center arterial section to new interchanges with NYS Route 17 near the County sewage treatment plan.
- Alternative D1 follows to the North on an abandoned Lehigh Valley Rail ROW, which runs North/South through the Village and Town of Horseheads, the Village of Elmira Heights, the Town and City of Elmira.
- Alternative D2 follows to D1 route and continues to possible Route 17 service roads.

### 6.2.1.4 Routes 13 and 14 Corridor Management Assessment – Draft Final Report (2004)

NYSDOT initiated this study because the economic analysis prepared for I-86 suggested the interstate might stimulate as much as \$650 million in economic development in Horseheads. As a result, the Chemung County IDA was looking for new areas for industrial and manufacturing sites in Horseheads, and a recent break-in-access along Route 13 created concern that NYSDOT would face future pressure for additional breaks-in-access.

To address these concerns, NYSDOT initiated this assessment to provide public education and direction for the transportation elements of a Comprehensive Plan update for the Town and Village of Horseheads. The assessments were also intended to recommend improvements to minimize unplanned development along each of these corridors. Three areas were assessed in this report:

- Route 13, between Route 17, Franklin Street and Old Ithaca Road
- Route 14, south of Route 17
- Route 14, from Route 17 to the Veteran Town line

#### 6.2.1.3.1 Route 13

- Route 13 is a two-lane arterial between Horseheads and Ithaca. The report identifies 189 acres of land with raw development potential along the NYS Route 13 corridor. The document further develops and rates three alternatives for future planned developments in the area along with costs and value of development potential for each alternative:
- Alternative 1, the Base Case, assumes no additional access points will be allowed from NYS Route 13 and no change in zoning will occur. This alternative limits any future development in the area. The



estimated value of development, under this scenario, is \$23.5 million.

- Alternative 2, Access with Current Zoning, assumes 2 additional access points are allowed with no zoning changes. Residential and commercial development would take place. The estimated value of development, under this scenario, is \$28.3 million.
- Alternative 3, Access with Multi-Use Zoning, assumes 2 access points are allowed and the target area is rezoned to allow mixed use commercial and retail development, in addition to targeted residential areas. The estimated value of development, under this scenario, is \$71 million.

The study discusses potential impacts, such as the cost of mitigating additional traffic and social impacts associated with additional development, and identifies Alternative 3 as superior because it provides full use of properties and best addresses local quality of life objectives. The study recommended that the Town of Horseheads undertake a Master Plan update, rezone the area and acquire right-of-way for access roads to the undeveloped land.

#### 6.2.1.3.2 Route 14

Unlike Route 13, Route 14 is already heavily developed. The Route 14 study set out to identify tools to minimize impacts of traffic on the community. The report references the Big Flats Highway Network Evaluation Study, which projects 7.7 million square feet of development between Sing Sing Road and Kahler Road by 2019 and recommends mitigation for increased traffic.

The report makes several recommendations regarding comprehensive planning, advising Horseheads to rezone portions of the town, enhance the local road network and modify the underlying zoning ordinances. First, rezoning specified areas to Retail and Office/Commercial zones would locate high density traffic in areas where their impacts are best tolerated, provide local retail with areas that are served by local traffic and

reduce the impact of abandoned properties by focusing development in certain areas. Secondly, enhancing the local road network will provide additional capacity, link subdivisions and roads, and separate local from through and truck traffic. Finally, modifying underlying zoning and subdivision ordinances will support zoning changes and road network improvements, reduce traffic impacts of development and reduce local costs by preserving low cost/high benefit infrastructure options and sharing costs with developers.

The significance of this study, from the perspective of this long range plan, is that the issues have been analyzed and recommendations have been provided. The next step will be for the Town and Village of Horseheads to revisit comprehensive planning, land use and zoning in these areas.

#### 6.2.1.3.3 Intelligent Transportation Systems Architecture

Intelligent Transportation Systems, or ITS, is the application of advanced technology computers, communications and sensor technology to the operation of surface transportation systems. The goal of ITS deployment is to improve the operation, management, efficiency and safety of travel on the transportation systems. The recently completed Architecture report identifies existing and future ITS elements. The future elements include Portable Dynamic Message signs, Road Weather Information Systems, Interactive Traveler information kiosks, freeway emergency management, closed captioned television (CCTV), Dynamic Message signs, and the City upgraded traffic signal system for the City of Elmira.

### 6.2.2 ECONOMIC DEVELOPMENT AND TOURISM

#### 6.2.2.1 Catharine Valley Trail Tourism Development Action Plan (2000)

A study was conducted by the ECTC & Office of Parks, Recreation and Historic Preservation to create an inter-community



tourism action plan for Chemung and Schuylar Counties. The Action Plan includes a summary assessment of the tourism market with demand profiles, a market area analysis and assessment of current marketing infrastructure. The Plan cites tourism as one of the fastest growing industries in the United States and New York State, and also finds that Chemung and Schuylar Counties are only 5 hours from several major U.S. and Canadian cities. With over 20 million people residing within 200-mile radius, the region is well-positioned to become a tourist destination. The study identifies opportunities, marketing strategies and tourism policy recommendations. Recommendations include phased development of new marketing materials, programs, products and services.



## 6.2.3 TRANSIT

### 6.2.3.1 Chemung County Transit System Evaluation Study ( 2002)

The object of the study was to examine public transportation within Chemung County, develop specific proposals for the bus system for the next five years, and review other issues related to governance of the transit and demand responsive paratransit system. Findings and Recommendations included:

- Governance – public/private oversight works well, but recommendations include
  - Use single firm for contracts

- Terms should be consistent with transit industry
- County oversight is not consistent with magnitude of system
- Transit Board should be established to provide expertise
- County should be informed of performance on a monthly basis
- County should own all assets
- Paratransit – system works well but escalation of costs are a concern and warrant ongoing scrutiny and more active governance
  - Drivers logs should provide more data w/ drop-off times, mileage
  - CCTS should be flexible in their use of fixed route drivers to achieve economies
  - On-time performance, productivity and other statistics should be monitored
    - Cancellations and no-shows should be tabulated
    - Accounting should identify costs by mode and paratransit market
    - Create council with members of human service transportation providers to create single source of information for users, provide forum for problem solving and facilitate joint purchases and cost sharing
- Fixed Route Service Plan
  - Alignment modifications are needed
  - Create interline service from one side of town to another without downtown transfer
  - Combine routes in outlying portions of County
  - Demand response replacement to general public with no eligibility restrictions
  - Hours of operations should be lengthened
  - Sunday service should be provided to provide mobility 7 days/week
- Streamline regional service



## 6.3 Anticipated Infrastructure Deficiencies

### 6.3.1 OVERVIEW

For a mature urban area such as Elmira, the fact that most of the infrastructure needed to support the population now and in the future already exists means that there is a major obligation to adequately fund maintenance and repair activities. As noted in Chapter 5, basic engineering analysis indicates that a significant fraction of the region's roadways and bridges will require minor maintenance or major rehabilitation during the twenty years addressed by this Plan.

Indeed, the ECTC, NYSDOT, and USDOT all have adopted goals that promote preservation of the existing system. Nationally, many agencies have emphasized the use of performance measures to guide their handling of maintenance needs that exceed their annual budgets. As the following sections explain, that approach has been adopted in Chemung County, with goals established for the highway and bridge networks in the future. These goals intend to ensure a reliable and safe traveling

experience for people and goods in the region.

### 6.3.2 HIGHWAY NETWORK

Recalling the discussion of the roadway network in Chapter 5, the infrastructure is divided by functional classification, descending in scale from interstates and expressways to minor arterials and collectors. Exhibit 5.3 illustrated the percentages of urban and rural roads that have been classified by recent inventories as poor or fair/good on the basis of visual inspection.

Exhibit 6.1 presents that same information but also indicates performance goals for each functional classification of roadway. For example, the table indicates that in 2025 only 10% of collector roads should be in poor condition (requiring major work) and 40% should be in fair/good condition (requiring minor work). Because 26.4% of rural collectors and 49.8% of urban collectors are currently in poor condition, it is clear that much work needs to be done over the next twenty years to achieve this goal.

**Exhibit 6.1: Highway Surface Performance Goals for 2025**

Functional Class	Lane Miles		% Poor ( < 5 )			% Fair to Good ( 6 - 7 )		
	Rural	Urban	Goal	Current Conditions		Goal	Current Conditions	
				Rural	Urban		Rural	Urban
Interstate	0.00	27.36	0.00%	0.0%	0.0%	30.00%	0.0%	0.0%
Expressway	0.00	43.92	0.00%	0.0%	0.0%	30.00%	0.0%	38.3%
Principal Arterials	70.14	83.76	5.00%	15.4%	14.0%	30.00%	59.6%	39.7%
Minor Arterials	31.46	119.76	10.00%	1.9%	30.4%	40.00%	54.7%	52.2%
Collectors	349.18	130.72	10.00%	26.1%	49.8%	40.00%	59.7%	41.6%

Exhibits 6.2 and 6.3 show the number of lane miles by area and functional classification that need improvement to achieve the desired goals by the year 2025

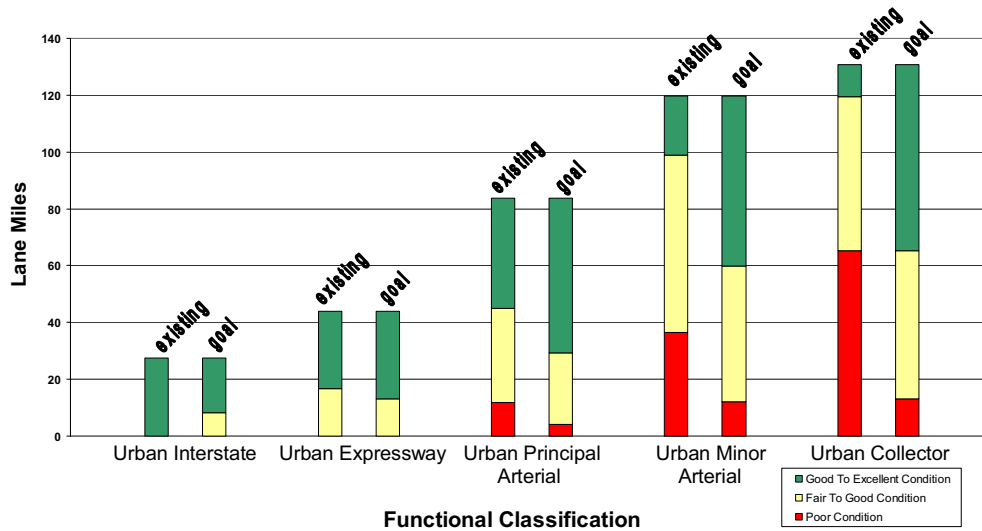
in urban and rural areas, respectively. In the urban area, approximately 36 lane miles of highway are in need of attention to achieve



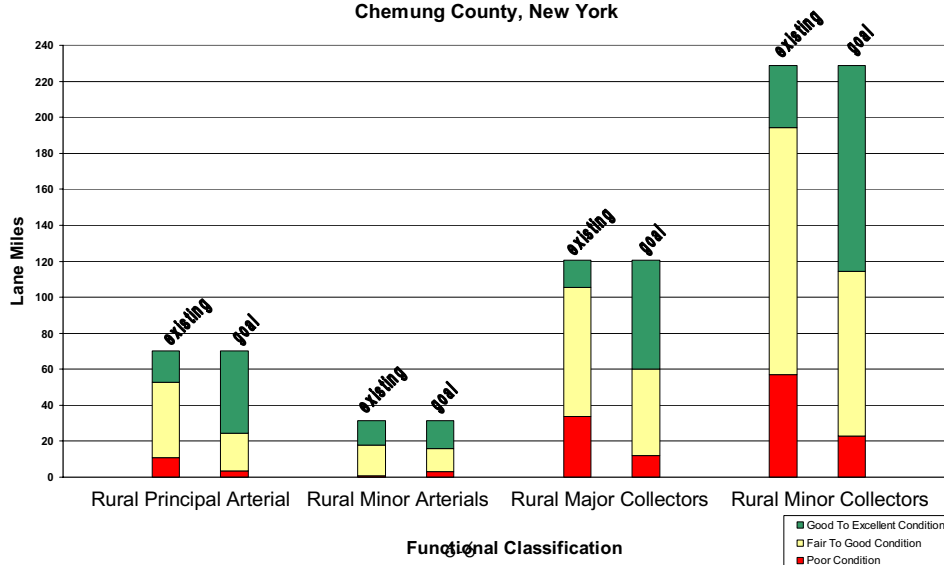
the pavement goals. Also, over the 20-year period, 50% of the urban area network – 25 lane miles – will need attention to maintain the system.

In the rural area, approximately 48 lane miles of highway are in need of reconstruction or rehabilitation to achieve the pavement goals. Also, over the 20-year period 50% of the rural area network or 25 lane miles will need minor rehabilitation to maintain the system.

**Exhibit 6.2**  
**Current Urban Area Highway Surface Conditions**  
**Chemung County, New York**



**Exhibit 6.3**  
**Current Rural Area Highway Surface Conditions**  
**Chemung County, New York**





locally-owned bridges are currently deficient. Agencies responsible for maintenance of the bridges are faced with the challenge of deciding which bridges need work and in setting priorities. The array of performance goals presented in Exhibit 6.4 indicates the priority that has been placed on interstate and expressway bridges, 90% of which should be non-deficient by 2025, in contrast to 80% in every other functional classification.

### 6.3.3 BRIDGE NETWORK

As Exhibit 5.5 illustrated, 23 of 84 (27.4%) state owned bridges and 62 of 183 (33.9%)

**Exhibit 6.4: Bridge System**

		Goal: Non Deficient (%)	State		Local	
			Current Non Deficient (%)	Difference (%)	Current Non Deficient (%)	Difference (%)
Rural	Interstate	90%	N/A	N/A	N/A	N/A
	Expressway	90%	N/A	N/A	N/A	N/A
	Principal Arterials	80%	68.75%	11.25%	N/A	N/A
	Minor Arterials	80%	37.50%	42.50%	N/A	N/A
	Collectors	80%	62.50%	17.50%	65.22%	14.78%
	Local (non-federal)	80%	50.00%	30.00%	62.69%	17.31%
Urban	Interstate	90%	100.00%	-10.00%	N/A	N/A
	Expressway	90%	60.00%	30.00%	N/A	N/A
	Principal Arterials	80%	81.25%	-1.25%	100.00%	-20.00%
	Minor Arterials	80%	100.00%	-20.00%	92.31%	-12.31%
	Collectors	80%	75.00%	5.00%	60.00%	20.00%
	Local (non-federal)	80%	100.00%	-20.00%	65.52%	14.48%

## 6.4 Scenarios and Transportation

### 6.4.1 INTRODUCTION

The needs and deficiencies described above are derived from planning studies and engineering analyses, all of which are focused on near-term, concrete developments around the County. The purpose of a long range plan, however, is to consider long-term trends, their impacts

on infrastructure and their consequences for mobility and accessibility in the region. The Plan is also an opportunity to contemplate the consequences of future scenarios other than the status quo. The purpose of this section, therefore, is to identify major driving forces in Elmira-Chemung's future and examine how those trends might influence the major travel modes.



## 6.4.2 DEMOGRAPHIC CHANGES

The baby boom generation's arrival at retirement age will have major transportation consequences, particularly in the provision of infrastructure and transit services. The deteriorating vision, hearing, and health of the elderly population will limit their automobile usage and make them increasingly dependent on transit and paratransit services. In addition, these same deteriorating physical attributes create unique challenges in the marketing, education and provision of transit and paratransit services and facilities. Containing the costs of increasingly expensive paratransit services will be essential.

When the elderly do use their cars, the design, operation and management of the highway and bridge infrastructure will need to be adapted to meet specific elderly needs. Attention must be given to improved visibility of signing, pavement markings and signalization. Signing will need to use highly reflective materials and sign legends will need to be upgraded in conformance with the Federal Manual on Traffic Control Devices. Pavement markings will need to clearly guide motorists. Signal timings will need to reflect increased reaction times and slower walking speeds. Highway and bridge designs will need to reflect the increased lane-width needs of the aging population. These adaptations should be designed to maintain the elderly population's freedom and mobility, while at the same time ensuring the safety of all travelers.

The expansion of the senior population in Chemung County (as with most other parts of the country) means that there may be a larger population housed in group homes and apartment complexes, which make the provision of health care simpler than single-family and low-density housing. Such concentrations of elderly populations will influence the patterns of demand for infrastructure and transit services. Ensuring that the transportation needs of these



higher population densities are properly served will become an increasing priority.

A second demographic group of concern is youth, not because there is any anticipated change in their magnitude or distribution, but because there is increasing attention to mobility constraints on young people without driver's licenses or access to vehicles. Public health advocates are increasingly concerned about the effects of sedentary life styles for young people, prompting encouragement of walking and biking to school and recreational activities. This should lead to focused studies of bike/pedestrian routes in the immediate vicinities of each school district, working closely with school officials and parents groups on appropriate investments and information campaigns. Increased attention will need to be paid to the pedestrian facilities around schools and neighborhood parks. Additionally, transit services should be promoted enthusiastically among the youth in order to reverse the negative social connotation attached to transit travel. Along these lines, transit service may be coordinated in such a way as to provide better access to and from youth activity centers, such as schools, shopping centers, after-school programs, etc.

Finally, it appears that the region is likely to continue to prefer new housing in suburban/rural settings that dominate the county as opposed to the City of Elmira. According to census data, the population in the county's major urban centers declined at a higher rate than the county average. Also, the mean household size in Chemung County declined from 2.57 persons in 1990 to 2.44 persons in 2000. As densities continue to decline, pressure



will mount on providers of infrastructure and transit services to expand as well. Specific to transit, the expected overall decline in population poses difficulties in providing a cost-effective fixed route transit system. The dispersion of population and employment in the service area makes it increasingly difficult to justify the rising costs of providing public transportation services. In essence, no one wants to pay for empty (or nearly empty) buses. Continuing studies of ridership, cost effectiveness and efficiency will need to be conducted at both the system-wide and route levels.

### 6.4.3 INTERSTATE 86 (I-86)

As one of the state's major trade corridors, the upgrade of Route 17 to I-86 is expected to bring a variety of economic benefits to the region. The intended impact, of course, is to increase long-distance travel through the county. Beyond the moderate benefits of through-traffic, however, the improvements are also expected to raise the status of Chemung County as a destination for businesses of all kinds and for visitors. I-86 is therefore expected to have a wide range of impacts, including increased travel through and within the region, increased tourism, economic development and increased prominence/use of the corridor for trade between the mid-Atlantic and the great lakes (NYC-Buffalo).

The upgrade to I-86 is expected to promote significant economic development. As I-86 improves the area's overall accessibility, the region becomes more attractive to a wide variety of commercial, retail, and industrial businesses. For example, the airport's proximity to the interstate will result in improved airport access and availability, allowing the airport to serve as a more attractive gateway to the region.

The increased travel through and to the region will necessitate infrastructure investments. There will be a significant need to maintain I-86 and to improve

connections from the interstate to the adjacent road network. With the project complete, it may be easier to focus on other issues, such as improvements to Routes 13 and 14. However, the high level of money flowing into the region will also change with project completion.

This expected influx of travel activity will likely have a mixed effect on non-motorized modes of transportation. On one hand, the upgraded highway may draw some traffic from arterials and local roads thereby improving safety for pedestrians and bicyclists.

The interstate will drive economic development and overall activity levels. These new areas of activity are likely to be less pedestrian friendly than traditional retail, commercial and employment areas, however local municipalities and real estate developers may find opportunities to accommodate and attract pedestrian and bicyclist traffic by locating and designing new facilities in Chemung County. Land use planning, arterial access management and other policies will help accommodate local road conditions for non-motorized transportation.

The completion of I-86 will dramatically affect the flow of freight in the region. The Federal Highway Administration (FHWA) predicts that New York State freight tonnage is expected to grow by almost 8 billion tons or 57% by 2020 (AASHTO 2). The FHWA estimates that average annual daily truck traffic (AADTT) will increase dramatically by 2020 (Exhibit 6.8).

However, much of this growth is expected in the west-east direction along the New York State Thruway and north-south along I-81. Proper maintenance of I-86 will be critical in establishing I-86 as a viable freight corridor.

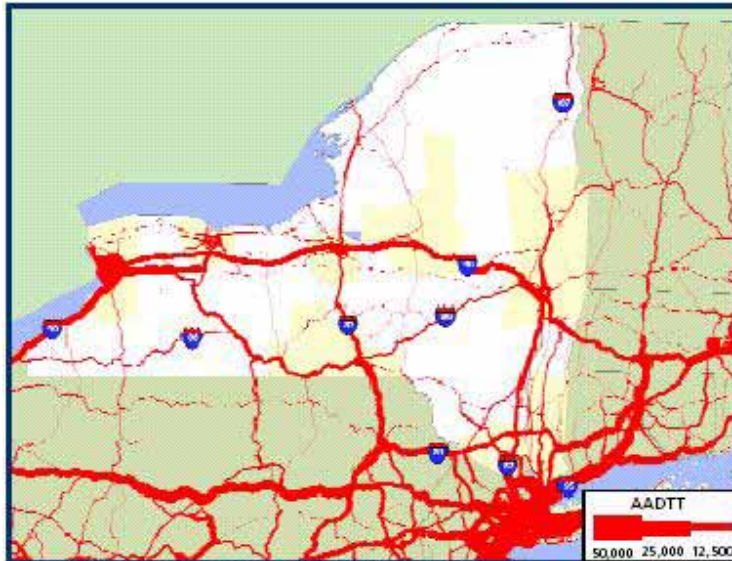
Chemung County's rail network traffic will increase as a result of I-86 designation, due to the rise of freight container shipments, which can be used by both trucks and rail cars. The designation of Route 17 as Interstate 86 will help the



Southern Tier become more competitive, allowing the region to capture a larger

percentage of the expected growth in freight.

Exhibit 6.8: Estimated Average Annual Daily Truck Traffic, 2020 (FHWA)



#### 6.4.4 TOURISM

The region is also counting on a boost to the tourism industry from the upgraded highway infrastructure. With ease of access to the region, promoters feel that the wine country and recreational amenities will catch on with the massive population (200 million within 200 mile radius) that lives within easy range of central New York.

Tourism will generate increased use of regional transportation infrastructure and services. There will be a need to ensure that the highways and bridges leading to tourist destinations are in good condition. These roads will also require clear and well-placed trailblazing signage. As tourists travel to the area for recreational outdoor activities and public attractions, many may choose to leave their cars behind. This may result in increased demand for public transit and should lead to continued studies concerning the location of service demand centers, the placement of routes, and the transit system's connectivity to other modes. Tourism should also result in increased use of the airport as a gateway to the region. As such, ensuring

that the airport is properly connected to several different modes of transportation will be vital.

Many of the expected tourists will come specifically to participate in outdoor activities, such as the Catharine Valley Trail and related amenities. The regional mindset suggests that attention should be paid to capturing visitors to one facility and encouraging them to follow a network of bike routes and pedestrian paths to explore other parts of the region, including the City of Elmira and other municipalities. Tourism in the region will simultaneously drive and be driven by amenities such as the multi-use trails under development. It is expected that the region's attractions will draw the type of tourists who will enjoy using these trails independently and as a means of getting around during their visits. Operators of bicycle tours have already discovered this region as an ideal destination. This phenomenon underscores the need to develop effective information materials on



the trails as well as the resources they connect.

#### **6.4.5 CONSTRAINED GOVERNMENT INVESTMENT**

At least in the near-term, it must be expected that government at all levels will continue to rein in and/or reduce spending in areas such as transportation. In all departments, from maintenance budgets to spending on new capital projects, the reduced revenues require an adjustment in expectations, especially if the region's population continues to decline.

The limited availability of funding will continue to result in funding and staffing difficulties, especially for transit and highways/bridges. Maintaining and optimizing the existing system will continue to be a priority. Opportunities to centralize and coordinate operations, as well as other cost saving strategies, will need to be explored.

In order for the region to continue to maintain an efficient transportation system, additional revenue sources will need to be identified. Because of the strong link between nonmotorized travel and the region's economic prospects and also health and quality-of-life concerns, transportation plans might seek to leverage funds from other agencies for these initiatives that have such broad benefits.

#### **6.4.6 OTHER**

The trends described above were chosen for their nearly universal effects on transportation modes and areas within the metropolitan area. There are a few trends, however, that should also be considered.

##### **6.4.6.1 Transit Awareness**

In order for the transit system to provide a truly viable alternative to automobile travel, greater awareness of the region's transit services must be cultivated in the region's residents. From the limited number of complaints, it is assumed that current riders find the system to be operating satisfactorily.

However, in focus groups and public outreach meetings, there was continued confusion over the types and quality of services offered by the transit system. Marketing, education and outreach efforts should be aimed at reducing this confusion. Special consideration should be given as to how best to reach low income and elderly individuals, who might have difficulty accessing information through traditional communication channels.

##### **6.4.6.2 Building Bicycle and Pedestrian Constituencies**

According to a 2000 Statewide Attitudinal and Preference Survey by Zogby International, 82.9% of residents in the Southern Tier support provisions for bicycle use, compared to a 76% average in New York State. While planning often anticipates the worst, this study highlights a potential opportunity to consider the best-case scenario - that continued investment in bicycle and pedestrian facilities succeeds in increasing the utilization of these modes for an array of trips. In turn, increased demand will drive commitment to multi-use trails and on-road bike routes.

##### **6.4.6.3 Safety and Security**

Another future concern is safety and security. The ECTC crash reporting is considered a best practice for MPO operations by FHWA and NYSDOT. Ongoing crash reporting and shared GIS data will help all municipalities in Chemung County better improve enforcement, engineering and education related to automobile crashes.

Regarding freight security, the September 11<sup>th</sup> terrorist attacks spurred new discussions about the relationship between transportation infrastructure and national security. The FHWA Office of Freight Management and Operations is currently examining freight mobility in the context of understanding and reducing system vulnerabilities as well as mitigating the effects of an attack and subsequent disruptions to freight activities. This is an issue that will be important to follow.



This page is intentionally blank.