



Lane County Planning Commission Memorandum

June 11, 2024 Date of Memorandum
April 16, 2024 Date of First Public Hearing
June 18, 2024 Date of Second Public Hearing

TO: Lane County Planning Commission
DEPARTMENT: Public Works / Land Management Division
PRESENTED BY: Taylor Carsley, Senior Planner
RE: **Department File No. 509-PA23-05452/05454** / A request for a Major Plan Amendment to amend the Lane County Rural Comprehensive Plan (RCP) to: **(1)** add a new quarry site to the Lane County Inventory of Significant Mineral and Aggregate Sites, and to authorize mining and processing pursuant to Oregon Administrative Rules (OAR) 660-023-180; **(2)** to amend the RCP to redesignate land from Forest (F) to Natural Resource: Mineral (NR:M) and rezone that land from Non-Impacted Forest Land (F-1) Zone and Impacted Forest Land (F-2) Zone to Quarry and Mine Operations (QM) Zone; **(3)** and a request for a Site Review for the review of the proposed mining operations pursuant to Lane Code 16.257(4)(a)-(j)

I. AGENDA ITEM SUMMARY:

The Lane County Planning Commission is being asked to review an amendment to the Lane County Rural Comprehensive Plan (RCP) to: **(1)** add a new quarry site to the Lane County Inventory of Significant Mineral and Aggregate Sites, and to authorize mining and processing of the site; **(2)** a Plan Amendment / Zone Change; and **(3)** Site Review for the proposed mining operations. The Planning Commission will make a recommendation to the Board of County Commissioners for their decision or continue their public hearing.

II. DISCUSSION:

For a review of the project description, criteria, and staff review, see the April 9th Planning Commission Memorandum.

Background

On July 6, 2023, the subject applications were submitted to the Lane County Land Management Division and were deemed incomplete on October 27, 2023. On November 30, 2023, the applicant's representatives met with staff and requested the application be processed as complete pursuant to Lane Code 14.050. Although LC 14.050 does not apply to Type IV applications, the applicant considered the application "adequate" pursuant to OAR 660-023-0180(8). Staff considered the application complete for processing as of November 30, 2023.

Between March 21-26, notice of the Planning Commission hearing was mailed to adjacent property owners and posted in the Register Guard. The applicant did not post notice on site in accordance with the requirements of Lane Code Chapter 14. The Planning Commission held a public hearing on April 16, 2024. The Planning Commission unanimously approved a motion to leave the public record open and continue the hearing to a date to be determined by staff and that will allow enough time to properly notice the next public hearing and for the applicant to address issues identified in the Notice of Incomplete Application dated October 27, 2023, the staff report dated April 9, 2024, and raised by parties.

Having not received additional information from the applicant since the first hearing, staff notified the applicant on May 8, 2024 that it would not be possible to review and process incoming material for a Planning Commission hearing scheduled on June 4, as contemplated during the first hearing. As such, staff requested a timeline extension to account for a later hearing date; however, the applicant declined to provide one. On May 8, staff also sent the applicant a memo further articulating concerns about analysis in the April 15 Sandow Memo. Attachment 1. On May 17, the applicant submitted additional information related to the local roads issues. Attachment 2. On May 21, the applicant submitted additional information related to discharge and open space conflicts (note the submitted letter is dated May 22, 2024). Attachment 3. The applicant followed the latest submittal indicating that it would be the last one ahead of the next Planning Commission hearing.

On May 29, 2024, the County mailed notice of the second Planning Commission meeting and posted the notice in the Register Guard on May 30, 2024. The applicant notified staff that notice was posted on June 3, 2024 and will provide an affidavit of posting prior to the public hearing.

III. STAFF REVIEW:

A number of application issues were previously identified by staff and others were identified by parties opposed to the project. The applicant provided submittals on May 17, 2024 and May 21, 2024 to address several of the application issues that were raised. Staff will provide a summation of how these submittals address the application issues in the interest of the Planning Commission's deliberation and recommendation.

Public Comment on Impact Area

The applicant has not responded directly to issues raised by other parties. One issue raised was the inadequacy of the 1,500-foot impact area. Determining the impact area is an issue for the Planning Commission to deliberate on because this is the area in which all other potential conflicts with proposed mining and processing activities are identified. The impact area shall be large enough to include uses listed in subsection (b) of OAR 660-023-0180(5) and shall be limited to 1,500 feet from the boundaries of the mining area, except where factual information indicates significant potential conflicts beyond this distance. The applicant has proposed a 1,500-foot impact area, consistent with the rule, and appropriate when there is no factual information indicating significant potential conflicts beyond this distance.

Since the April 9th staff report to the Planning Commission, evidence has been submitted by parties indicating that the 1,500-foot may not be sufficient. The April 16, 2024 submittal from Save TV Butte and LandWatch Lane County, represented by Sean Malone, includes a letter from wildlife biologist John M. Goodell. This is provided in Attachment 5. Mr. Goodell recommends assuming impacts to winter range habitat and calving areas of Roosevelt elk within approximately 2,500 feet of the project perimeter. This

recommendation appears to be based on an observational study of elk following simulated mining activities and literature on elk avoidance of habitat near roads, although Mr. Goodell acknowledges no distance data for surface mining impacts to elk habitat currently exist.

In the May 18, 2021 letter attached to their April 16, 2024 comments, ODFW expresses concerns about conflicts associated with direct loss of habitat. It stated:

“The department is concerned that the conflict due to loss of habitat has not been adequately considered, and the analysis has been limited to only 1500 feet from the boundary of the mining area...This may result in increased private property damage by elk adjacent to the mine.”

ODFW further provide that *“these large herds cause significant damage to agricultural lands, fences, and other features on property”* that is not currently being experienced and that such damage would likely result in ODFW issuing more elk tags to further reduce the population.

Factual information has been submitted that indicates significant potential conflicts to Major Big Game habitat may occur beyond the proposed 1,500 foot impact area, as a result of mining. Staff recommend the Planning Commission consider the evidence and deliberate on whether or not to determine an impact area of more than 1,500 feet from the mining boundary.

Mr. Malone provides that significant conflicts resulting from the generation and distribution of silica dust also justify an impact area that is larger than 1,500 feet from the mining boundary. Staff is not aware of factual information indicating how the application’s proposed minimization measures are not sufficient, including the requirement to adhere to LRAPA General Air Contaminant Discharge Permit conditions which regulate fugitive dust emissions, including emissions of dust that contain silica, and to the BMPs recommended by SLR Consulting (e.g. maintain vegetative ground cover on stockpiles, water roads and trucks, etc.).

Conflicts Due to Noise

Staff provided the following in their April 9th report to the Planning Commission:

“Under the applicant’s conflict minimization plan on page 21-22, the applicant concludes the noise conflict will be minimized by adherence to recommended measures within the DSA report. The ability to ensure compliance is an important component of the minimization plan. If compliance cannot be reasonably achieved through clear and objective or otherwise feasible monitoring, then conflicts may not be minimized. Based on the DSA report, it appears feasible that noise conflicts (including those generated from blasting) can be minimized, however staff consider issues to exist with the proposed monitoring plan, implemented through Condition 27. Conditions must be clear and enforceable. Staff recommend the applicant address these and other issues identified with the noise monitoring plan to ensure that noise-related impacts are minimized.” Page 10.

The application’s noise study, prepared by DSA provided that noise levels generated by mining without minimization measures will exceed DEQ limits at 13 of the 22 residences. As previously discussed, these DEQ limits act as thresholds of significance for purposes of noise-related conflicts. With minimization measures provided, noise levels were still predicted to be at or within 1dBA of the DEQ limits at 9 of the 22 residences. The application’s proposed minimization plan utilizes a monitoring program to ensure that generated noise levels remain less than significant. Condition 27. Legitimate concerns about the ability for the proposed noise monitoring plan to ensure compliance with the modelling were raised in

public comment and by staff. Concerns included but were not limited to those provided in the April 9th staff report listed below (renumbered for convenience):

1. The monitoring plan does not offer means of ensuring compliance if private property owners do not agree to allow for the installation of monitoring equipment and for the imposition of monitoring activities to occur at their residence. What alternatives are in place for by-default monitoring to occur off potentially noise-affected properties?
2. The monitoring plan appears to provide a relatively small amount of response time for property owners from the time of receipt of the notification of operations. Notably, operations may commence prior to property owners even receiving notification.
3. The plan only requires noise compliance measurements to be made during a time when a rock drill is in operation as well as the aggregate crushing and screening equipment. There are no required measurements during blasting activities. Regardless of DSA's professional experience that blasting related noise is within the DEQ limits at residences in close proximity to the blast, this condition is supposed to ensure compliance with that professional experience.
4. There is no methodology provided for conducting the noise measurements.
5. There is no methodology provided for reporting on the noise measurements. What is being reported? Average or peak measurements? How will data be reported in a consistent, clear and objective way?
6. The operator is not required to file an application for verification of noise compliance with the County.
7. The County would only have 30 days to act on a report demonstrating or suggesting the occurrence(s) of excessive noise.
8. Mining and processing activities are not required to stop until subsequent compliance measurements show compliance, allowing non-compliance to continue for up to 90 days.
9. There is no limit to how many times noise measurements may be noncompliant. If non-compliance does not result in stoppage of operations, and if there is no limit to non-compliance, then the quarry may presumably operate permanently exceeding the DEQ noise limits.
10. There is no program for periodic noise monitoring until a new phase is started. It is possible noise compliance may be reached and immediately violated before a new phase has begun.

The Cascadia Wildlands testimony submitted by Crag Law Center, dated April 16, 2024, included in Attachment 5, also articulate issues with this the monitoring plan. Instead of addressing these potential issues, the applicant suggests in their May 22, 2024 submittal that because the monitoring plan was approved in Ordinance PA 1363 (2018) it should not be questioned here. Staff note that both Ordinances the applicant provides in their May 17 and May 22 response are no longer effective as a result of the LUBA remand on October 16, 2019. Even so, the review of the subject Type IV application is *de novo*. It is now important to thoroughly review and analyze issues that may minimize conflicts to a less than significant level and the potential for appeals of a County decision.

Staff also disagree with the applicant's consideration that expert evidence is necessary to identify issues with a monitoring plan that were not raised in a previous record. Condition 27 is a logistical framework for ensuring compliance with modelled noise standards and is supposed to be clear, objective, and enforceable. What is proposed is most likely not clear, objective, and/or enforceable and appears to give rise to the issues referenced above. Staff recommend considering conflicts due to noise not fully minimized without the imposition of a monitoring plan that is clear, objective, enforceable, and implements verifiable corrective measures.

Conflicts Due to Airblasts and Vibration

As with conflicts due to noise, a minimization monitoring plan to ensure that conflicts are minimized is essential. Although previously discussed, it is important to note that the DSA report (Appendix E, application), and later ABD Engineering & Design letter (Appendix N, application), provide that it is feasible for ground vibration and airblast energy associated with the project to remain under the DEQ threshold of 98 dBC, slow response. Further, the report by Wallace Technical Blasting (Appendix O, application) found that it is feasible for the operation to comply with vibration and air overpressures imposed by NFPA-495. The proposed monitoring plan, Condition 62, has some, but not all the issues associated with the noise monitoring plan. Foremost is the fact that blast monitoring will only occur in the first year of operations. The quarry would be operating for up to 50 years in three different phases. A sample size of monitoring more representative of the proposed operations over the life of the quarry should be made to ensure compliance with the DEQ and NFPA-495 requirements. Staff recommend deliberation on extending this monitoring plan to ensure the operation's compliance over time with applicable standards on airblasts and vibration.

Conflicts to Local Roads

Staff identified issues with the applicant's Transportation Impact Analysis in the Notice of Incomplete Application dated October 27, 2023, in a memo from Transportation staff dated March 27, 2024, and in a memo from Public Works Transportation staff on May 7, 2024. These issues included the proposed location of the driveway access on Dunning Road, the applicant's problematic methodology applied in calculating sight distance, the finding that the existing Dunning Roadway width is sufficient, and a lack of pavement analysis. The applicant submitted material on May 17, 2024 including a letter, a memo from Sandow Engineering, and a copy of Ordinance No. PA 1343 (2017). The applicant's letter and Sandow memo dispute staff concerns listed above. While staff continue to disagree with the applicant's May 17th arguments, their referral to the 2017 ordinance is helpful, because it appears to address the majority of transportation concerns through clarifying the applicant's acceptance of previous findings and conditions. See the Public Works Transportation staff memo, dated June 4, 2024 provided as Attachment 4. While issues continue to exist with respect to the methodology used to calculate sight distance, the inclusion of Condition of Approval 17 satisfies the staff concern about insufficient roadway width, despite the TIA assertions that existing roadway width is currently sufficient.

As provided in the June 4, 2024 Public Works Transportation staff memo, a significant conflict remaining to Dunning Road is the lack and inadequacy of visual clearance at the site access. The applicant should determine the 85th percentile speed, which is the proper methodology to calculate the westbound stopping sight distance and the necessary extent of vegetation and earth embankment removal. As an alternative, the applicant may provide the stopping sight distance utilizing the 55 mph statutory speed. The applicant has been unwilling to provide this information based on assertions provided in the TIA and multiple Sandow Engineering memos. Transportation staff disagree with the findings in the TIA and Sandow memos for the reasons provided in the June 4th material. If the requested analysis is not provided, staff recommend finding this significant conflict cannot be minimized. If this is the finding of the Planning Commission, the corollary recommendation for the Planning Commission's consideration is that the Board consider the analysis of economic, social, environmental, and energy (ESEE) consequences in an Order for denying the application.

Conflicts to Goal 5 Resources – Major Big Game Habitat

Staff highlighted that conflicts to Major Big Game Range, a significant Goal 5 resource, were not fully identified or minimized in the Notice of Incomplete Application dated October 27, 2023. The application's impact assessment entitled *Goal Five Big Game Impact Assessment Report, Old Hazeldell Quarry, Lane County, Oregon (dated May 7, 2018)* by Northwest Resource Solutions LLC was recycled from the previous application. Staff identified issues with the 2018 impact assessment report in October

2023, but the applicant opted to not respond to these issues. Staff further identified issues with the impact assessment report in the April 9 memo to the Planning Commission prior to the first public hearing. The applicant opted not to respond to these issues. Staff from the Oregon Department of Fish and Wildlife (ODFW) provided a letter dated April 16, 2024, noting, *“The application overlooks appropriate minimization and mitigation measures and continues to be plagued by the deficiencies that had been identified by the department in previous applications.”* Included with this letter were the two previous letters (dated April and May 2021) from ODFW regarding the failure of the 2018 impact assessment report to address significant conflicts to major big game habitat. The applicant did not respond substantively to this letter in the April 16th hearing other than to acknowledge that more work is needed on the big game issue. At the hearing, the applicant offered that they did not want to address the big game issue until they had heard from ODFW notwithstanding the fact that the 2021 ODFW letters were already in the record. As of this date, the applicant has still not addressed significant conflicts to Major Big Game Range outside of the problematic 2018 report, even though this was a primary reason for the Planning Commission’s continued public hearing. As a result, it is recommended that the Planning Commission find that significant conflicts to Major Big Game Range exist as a result of the proposal that cannot be minimized. If this is the finding of the Planning Commission, the corollary recommendation for the Planning Commission’s consideration is that the Board consider the analysis of economic, social, environmental, and energy (ESEE) consequences of approving, limiting, or not approving in an Order for denying the application.

Other public comments consider that project conflicts to Major Big Game Range have not been properly or fully evaluated. The April 16, 2024 submittal from Save TV Butte and LandWatch Lane County, represented by Sean Malone, includes a letter from wildlife biologist John M. Goodell. This letter primarily addresses conflicts to Roosevelt elk. According to Mr. Goodell, the TV Butte site may be used as both winter range and/or calving habitat for multiple Roosevelt elk herds, not just one. Further, the site likely affords a unique combination of topography, security cover, and forage, even though the site is located near a population center. Mr. Goodell discusses the limitations of higher elevation forest habitat for winter and calving range. In the west Cascades, wintering elk are typically seen in lower elevation forests that offer benefits for wintering and calving in close proximity. The letter advises caution in considering additional impacts to low and mid elevation forests that serve as habitat given the fact that 11,000 acres of such elk habitat was already removed for dam construction in the 1950s and 1960s in the Willamette National Forest. Mr. Goodell addresses conflicts from human traffic, road traffic, and surface mining specifically, which result in a decline in cow/calf proportions, a reduction in feeding and increase in movement time, and abandonment from calving areas. The letter provides that *“it is likely that surface mining activity, and related increase in vehicle and human traffic, will result in elk movement away from the site, abandonment by pre and post-calving cows, decreases in local reproduction, and possible increases in local mortality.”* With respect to the impact area surrounding the mining site, Mr. Goodell recommends considering reductions in elk use of winter range and calving areas within approximately 2,500 feet of the mining boundary. That is to say that mining conflicts to Roosevelt elk habitat may occur within a larger impact area than identified by the applicant.

Based on evidence provided by ODFW and Goodell, it appears significant conflicts to Major Big Game Range will occur and that measures provided in the application’s 2018 impact assessment report do not minimize to a less than significant level. The applicant has had opportunities, but declined to address the concerns about significant conflicts to Major Big Game Range. Therefore, the Planning Commission may conclude that that there are conflicts and that they have not been minimized.

Conflicts to Goal 5 Resources – Open Space and Scenic Areas

In the April 9, 2024 Planning Commission memo, staff identified potential project conflicts to the 'Willamette Highway/Salt Creek Corridor,' and requested the applicant address this. The applicant responded in their May 21, 2024 submittal by providing that the Board did not conclude the Salt Creek Corridor is an acknowledged Goal 5 resource in the previous application and identifying this now conflicts with the Board's previous determinations. The applicant also considers it factually incorrect that the subject corridor is an inventoried, acknowledged Goal 5 resource.

Under Lane Code Chapter 14, the review of the subject Type IV application is *de novo* meaning all issues of law and fact are heard anew. At the same time, the proceedings are not limited by the previous record as this is a brand new application, not a remand of the previous application. Although it was remanded several times, the previous application was ultimately denied by the Board of Commissioners in 2021. It is now important to thoroughly review and analyze issues that may not have been considered in the previous proceeding to provide for the most well-informed decision as well as to minimize potential for appeals of a County decision and/or support a defensible County decision.

To the extent this fact is applicable, as far as staff understand, the Board did not make express findings that the Willamette Highway/Salt Creek Corridor were *not* acknowledged significant Goal 5 resources. If the applicant believes this area is not an acknowledged open space resource subject to the Goal 5 rule, it should provide evidence of this beyond the one paragraph summary from DLCD that appears to be at odds with the language of Goal 5, Open Space and Scenic Areas Policy 3. As provided in that policy, the Willamette Highway/Salt Creek Corridor is one of "six major areas of outstanding scenic value in Lane County. These areas are to be considered '3C' resources in terms of OAR 660-16-000/25." Goal 5, Open Space and Scenic Areas Policy 3. Staff have included OAR 660-016 that existed prior to 1996 as Attachment 6. Under this previous Goal 5 rule, the County was required to collect available data regarding the location, quality and quantity of each Goal 5 resource, and determine whether there was enough information to properly complete the process. Based on analysis of the collected data, the County had three options: (a) do not include the resource on the inventory; (b) delay the Goal 5 process until more adequate information was available; or (c) include the resource on the plan inventory. These were known as the "1A," "1B," and "1C" options, respectively. An acknowledged "1C" resource is one that is "significant" under the current OAR 660-023-0180(5)(b)(D). After identifying "1C" resources, the County identified whether conflicting uses existed. If so, based on the economic, social, environmental, and energy (ESEE) consequences, the County developed a program to achieve the goal. The program could (1) protect the resource site; (2) allow conflicting uses fully; or (3) limit conflicting uses. These were known as the "3A," "3B," and "3C" options, respectively. For this reason, staff understand that a prerequisite of a resource being designated "3C" is that it was first a designated a "1C" resource included on the RCP inventory. Therefore, staff do not agree with the applicant's May 21st argument that the Willamette Highway/Salt Creek corridor is not an inventoried, acknowledged Goal 5 resource. The policy language appears to make clear otherwise.

Because the applicant has provided argument against addressing this Goal 5 resource in lieu of identifying conflicts, a part of the Goal 5 analysis appears to be left uncompleted. Staff previously posited that conflicts to this scenic corridor could possibly be minimized through the proposed QM zone and Site Review criteria because the policy language itself provides that conflicting uses be managed through the rural resource zones. However, without identifying whether or not there are conflicts to this scenic resource, it is inappropriate to find that find that potential conflicts are minimized as proposed.

Conflicts to Goal 5 Resources – Water Resources

As provided in the April 9th staff report and by parties, the application does not quantify the operation's proposed water use in relation to water availability. This may not be problematic in and of itself; however, this information is necessary given the location of the western permit boundary within an RCP-designated water quantity limited aquifer and all of tax lot 1900 within a Board-designated Groundwater Quantity Limited Area and the fact that other dust discharge minimization measures rely on the availability of a water supply. Additionally, staff requested that the applicant address whether water sourced from what the Shannon & Wilson report delineate as the "Midlands" area for the quarry will conflict with other water users in Midlands area. The report appears to assume that groundwater serving the quarry will only be sourced from the "Highlands" area which is the location of the quarry area itself. The rock mass at the quarry itself is said to act as an "aquitard," or area of very low permeability and groundwater movement. As such, the Shannon & Wilson report finds that the likelihood of groundwater flow between Highlands and Midlands areas is unlikely. However, potential conflicts to surrounding groundwater users in the Midlands area do not appear to be addressed if water is sourced from the Midlands area. Given that the applicant owns adjacent property outside of the Highlands area into the Midlands area, staff consider this to be a valid issue.

The applicant has not responded to this issue. Ideally, the applicant would address this issue to inform the Planning Commission's deliberation on potential conflicts to water resources. Without additional evidence or clarification, staff recommend considering the restriction of groundwater used for quarry operations to only that sourced from inside the mining boundary itself.

IV. OTHER ISSUES

Site Review

In the April 9th staff report, concerns with the application's analysis of the Site Review criteria of Lane Code 16.257 were raised. These included issues related to screening and lighting, ensuring safe and efficient circulation, and the inconsistency between the applicant's Figures 1-6 and the DOGAMI Plan set included in Appendix K. The purpose of the Site Review Procedures is:

"to encourage the most appropriate development of the site compatible with the neighborhood, to prevent undue traffic and pedestrian hazards or congestion, to reduce adverse impacts upon public facilities and services, and to provide a healthful, stable, efficient and pleasant on-site environment."

A large portion of public comment received in this record is related to site compatibility with the neighborhood. Since the applicant has not addressed the concerns raised, staff recommend the Planning Commission deliberate on the prescription of conditions to ensure consistency with Site Review criteria, to the extent that the recommendation is for approval of the application.

Public Comment

Approximately twenty (20) public comments in opposition to the application were submitted to Planning Commission on April 16, 2024. These comments were received after publication of the supplemental staff memo dated April 16th and/or during the hearing on the same day. These comments are provided as Attachment 5.

V. RECOMMENDATION

Based on the available information currently in the record, staff is unable to make a positive recommendation. It was hoped that the applicant would address missing and insufficient material, most of which was first identified in October of 2023, and then in March and April of 2024. The applicant has been aware of ODFW concerns about Major Big Game habitat associated with mining activity at this site since April 2021, as evidenced by the previous letters from ODFW. Staff previously recommended the Planning Commission keep the record open so that the applicant could more thoroughly address identified conflicts and propose minimization measures, if feasible, for review and further recommendation at the Planning Commission level. The applicant's testimony at the Planning Commission suggested that although the applicant had been aware of big game issues, they did not wish to address these issues until ODFW provided comments for this record. ODFW did so on April 16, 2024. As such, it was staff's understanding that identified project issues, namely those associated with big game, would be addressed in a timely manner. This has not been done.

The Planning Commission will ultimately make a recommendation to the Board of Commissioners. Given the inadequate application and identified significant conflicts that are not minimized, the Planning Commission may choose to recommend the Board order the preparation of economic, social, environmental, and energy (ESEE) consequences of allowing, limiting, or not allowing mining at the site to accompany a draft Order for denial. Alternatively, the Planning Commission may choose to keep the record open for further deliberations and a recommendation, should the applicant agree to provide materials and timeline extensions.

VI. ATTACHMENTS

1. Lane County Transportation Staff Memo (dated May 7, 2024)
2. Applicant Response Materials (submitted May 17, 2024)
3. Applicant Response Materials (submitted May 21, 2024)
4. Lane County Transportation Staff Memo (dated June 4, 2024)
5. Public Comment Submitted on or after April 16, 2024
6. OAR 660-016 (1996)

Link to Application as submitted on July 6, 2023:

<http://apps.lanecounty.org/LMDPro/FileViewer.aspx?ID=25353068>

Link to Uploaded Record Materials for First Public Hearing:

<https://www.lanecounty.org/cms/One.aspx?pageId=6082602&portalId=3585881&objectId.92057=20205962&contextId.92057=6082603&parentId.92057=20181512>