

US EPA ARCHIVE DOCUMENT

# Port Of Los Angeles and Port of Long Beach Health Impact Assessment Scoping Meeting: Notes from Facilitated Feedback Sessions

*Convened by the Environmental Protection Agency Region 9, and  
co-facilitated by Human Impact Partners*

**2/10/10**

These notes should aid attendees in recalling comments and discussions from the meeting, but are not a detailed account of the wide-ranging discussions that occurred.

## ***Exercise 1a - Reviewing 9 Pathways to Health***

### **Process:**

1. The objectives of this exercise are to introduce the pathways, see what is missing and can be eliminated, and to answer any general questions. There will be a Q&A/comment session after the exercise.
2. Facilitators will stand/sit by their assigned pathway diagram/s.
3. Participants will circulate to see all 9 pathways.
4. Facilitators will help answer any clarifying questions.

Note: In this session, participants frequently raised questions outside the subject of the particular poster (e.g. air emissions).

### **Feedback:**

#### **Noise (Facilitator: Deldi Reyes, U.S. EPA Region 9)**

- Education (possible new issue area)
  - Look at education outcomes
  - Vulnerability as a measure of a population
  - Ability to benefit based on impacts (impacts to academic achievement)
  - Projects-specific educational attainments impacts (later impacts community's ability to participate in and respond to project info)
  - Employment opportunities impacted by educational attainment
- Public/alternative transportation (possible new issue area)
  - Impacts of port-related projects on public/alternative modes of transportation
- Reproductive health
  - As an additional outcome/impact measured
- Vibration

#### **Air (Tom Kelly, U.S. EPA Region 9)**

- Missing - petroleum industry – tanks, refueling
- Links of causality in diagrams may not all be substantiated (e.g. air pollution reduces or changes walking)
- Fumigation facilities on/off port
- Diagrams don't address no project
- Shouldn't health impacts of purpose/need of a project also be evaluated, not just the project impacts
- How does a HIA (and/or diagrams) compare project alternatives?

- Displacement diagram questionable
- Existing health impacts not addressed
- Short term vs. long term health impacts
- Port expansion on neighborhood infrastructure questionable
- Difficulty in establishing regional baseline conditions at the scope, should see more regional involvement (SCAG). Will also identify feedback loops for more structured forces not directly related to ports
- How are impacts/benefits prioritized in diagrams (Is an increase in asthma worse than a decrease in the walkability of a neighborhood?)
- Should do an equivalent HIA on the “no project” alternative to assess benefits
- How do diagrams deal with the long-term nature of individual projects (i.e., 30 year project may have different impacts over time (both good and bad)
- A broader focus – region-wide HIA will help finance – port has limited funding available.
- Displacement has occurred. The local fishing industry (another historic industry mentioned, which I can not recall) were displaced. The Port offers many high paying positions than the fishing industry but it was displaced.
- One port tenant fumigated a container in a mixed residential/industrial neighborhood. This is not a port issue, because the County Agricultural Commissioner was the agency that investigated, but it would not happen in neighborhoods away from the port.
- Too many container chassis (repair) facilities in Wilmington. The City of LA (Wilmington is part of the City of LA) agreed to halt new permits for this business. After further investigation, the City of LA realized that only 17 of 31 chassis repair facilities near the port had proper permits. (Note: I am not certain if this was originally raised as a noise issue. Containers at these facilities can be stacked four-high. This would seem to create a lot of noise.)
- This study (or its conclusions) is (are) too subjective. The Ports are frequently sued on decisions. If HIA doesn't have a clear standard for action, how can the Port defend its decision in court?
- HIA is too subjective. It opens up the EIS/EIR to more questions.
- The pathways don't capture the benefits. The Ports generate \$2 Billion per day for the local economy.
- The port is one hub in a goods movement network. To really evaluate the effect of goods movement, you need a lifecycle assessment.
- Port-Wide HIA will establish a baseline making future project specific HIAs simple.

#### **Water (Facilitator: Steven John, U.S. EPA Region 9)**

- Displacement – eliminate – ports do not expand into neighborhoods
- Infrastructure – eliminate – ports do not expand into neighborhoods
- Livability – eliminate – all of these effects are dealt with in other issue areas
- Economic effect – access to goods (increase in affordable goods, increase disposable income)
- Consider the “holistic” effects of no project (evaluation of how demand for goods would be met without the proposed project)
- Consider impacts of change in regulations

#### **Traffic and Rail (Facilitator: Jen Lucky, Human Impact Partners)**

- How does this (or other) pathway account for changes in emissions, for example, what if there are more vehicles/ rail, but they are all lower emissions vehicles, so that increases in traffic and rail does not for example increase PM2.5

- How can new ways to move goods be represented on these pathways – for example is goods could be moved in a way that does not increase traffic and rail volume (alt. transportation). This could actually enhance “complete streets”, and increase PA, and still increase goods movement
- Need to represent co-benefits of moving goods in a way that improves health
- Could HIA be used as a conflict resolution process to avoid negative impacts, could it get people to sit down at the table together, and communities to be part of the solution
- What about potential conflicts between regulations and health impacts. For example, it is a requirement for trains to blow their horns, however, this may be a harmful noise impact (but if they didn’t sound hours this would be a ped. And car safety hazard)
- What about how health promoting mitigations will impact jobs, and how that will in-turn impact health
- The Port of LB is aging. For example, the Gerald Desmond bridge, in addition to needing repairs for safety, needs to be renovated to increase the Port of LB’s competitive edge, which will directly impact the number of jobs that can be generated and maintained by activities at the POLB
- Impacts to jobs internationally should also be considered in HIA, including how international business with the Ports impacts jobs locally
- If regulations become more strict, or growth at the Ports is inhibited, will business move elsewhere? What impacts will that have on local jobs, the economy, and otherwise?
- What are the costs of mitigation measures – and could the costs of mitigation measures impact the ability of the Ports and their facilities to operate?

#### **Employment (Facilitator: Denise Dickinson, U.S. EPA Region 9)**

- 24/7, 365 impacts vs. a particular action at the Port (noise, air pollution)
- Is there some sort of bifurcation over larger, long term effects
- Could liveability acknowledge more: put in water, noise, air pathways
- How far are we measuring? What is the end point? Regional, state, local, national and international impacts, trade, economics (sustainability)

#### **Neighborhood Livability (Facilitator: Jonathan Heller, Human Impact Partners)**

- Need to include local and regional economic effects more fully

#### **Port Revenue (Facilitator: Zoe Heller, U.S. EPA Region 9)**

Additional Pathways:

- Security
- Income
- Solid/special waste
- No pathways should be eliminated
- Difficult to define pathways without scope/geographic boundary

#### **Displacement and Neighborhood Infrastructure (Facilitator: Marnie Purciel, Human Impact Partners)**

Discussion was about sufficiency of EIS process:

- EIS scoping is inclusive – meetings are open to the public and 100s of people attend.
- If 100s of people attend EIS scoping meetings, would like to see a survey of who is at the meetings.
- Community groups feel intimidated by the EIS process and messaging at meetings.
- If people see a different face at scoping meetings, maybe they will feel more included.
- Environmental Justice lens could impact how outreach is done for mitigation.

## ***Exercise 1b - Collecting Initial Input***

### **Process:**

1. Each table will discuss the same questions. The questions will be written on a piece of easel paper on each table. Participants are encouraged to record their own responses on the paper using the markers provided. Table facilitators will also take notes to ensure all comments are recorded.
2. Facilitators introduce discussion questions one by one. Facilitators can remind/encourage participants to record their own thoughts on the easel paper.
3. Facilitators can record any additional comments in the notes section below.

### **Discussion Questions:**

1. *Are there community concerns not covered here? (e.g., Are there general pathways that are missing?)*
2. *Are there general pathways we can eliminate and why?*
3. *Other comments about the pathways?*

### **Feedback:**

#### **Air (Facilitator: Deldi Reyes, U.S. EPA Region 9)**

- Community cohesiveness/social networking
- Exercise and recreation
- Displacement of economic activities/opportunities
- Economic impacts (to health dept., local communities, hospitals and direct service providers, individuals) of health impacts/issue areas...and who pays?
- Climate change
- Induced traffic
- What are the health impacts from going with the no-action alternative?
- Quality of education received throughout the community – this cuts across all issues. The ability to benefit from an education is impacted by health status due to vulnerability.
- The displacement effects pathway needs to include the availability and quality of low-income housing.
- Need a category for reproductive health impacts
- Competition for public transportation dollars. These dollars are pitted against dollars for moving goods, in other words, truck traffic competed with public transit projects. This creates additional pedestrian impacts as options are squeezed.
- Other issue categories:
- Community cohesiveness
- Exercise opportunities / recreation
- Displacement of economic opportunity such as affordable housing. The first discussion group did not agree that displacement is optional and cited direct and indirect examples (parks, public housing near ports caused by I 710 expansion (which is linked to port expansion).
- Impacts to social networking

- No areas / pathway diagrams that we can eliminate?

**Noise (Facilitator: Tom Kelly)**

- Locomotives now serviced and fueled at rail yards – increase noise beyond locomotives in motion
- Flow diagram addresses noise effects at peak or cumulative, but noise levels may be sustained but below health-protective levels.
- What is change in perception?
- Related facilities (container storage yards, trans-load [?]) not addressed.
- How do city noise requirements fit into the pathways
- I have never heard of a connection between noise and heart attacks.

**Water (Facilitator: Steven John, U.S. EPA Region 9)**

- Eliminate the water supply box and ingestion (not relevant in port area)
- Add two elements: 1. Invasive species; 2. Land creation
- Toxic leakage—add “terminals”
- Eliminate “food supply” and “change in nutrition” boxes
- Add “contaminated sediment cleanup” box

**Traffic and Rail (Facilitator: Jen Lucky, Human Impact Partners)**

- How do you weigh what is a priority health impact? What is the value system that you use, for example, how do you weigh the value of a job vs. exposure to diesel? It feels like a nebulous process
- Every project gets sued no matter what. – “projects are held hostage”
- Overall, these pathways need to look much broader (for example pathway #9, tax & revenue)
- Piece missing – all projects have a purpose and need, what are the health impacts of a purpose and need in addition to looking at other impacts
- Warehousing is an issue that is missing from these pathways
- The intention of all proposed port projects are to be improvements
- It seems like there is assumed bias in the pathways shown here
- All health outcomes on these pathways should have a delta in front of them
- The pathways should be less inflammatory

**Employment (Facilitator: Denise Dickinson, U.S. EPA Region 9)**

- add change in local economy
- change in goods/services in local community
- do the jobs include the benefits

**Displacement and Neighborhood Infrastructure (Facilitator: Marnie Purciel, Human Impact Partners)**

- People don't live here
- Traffic could cause people to not want to live here
- EIS looks at traffic/noise
- Does this process make it more accessible than the 30 minute comment period available with the EIS?
- That is not accurate – the EIS allows for more than just 30 minutes.
- Don't think there is indirect displacement

- Noise levels comply with OSHA guidelines and the risk is really only for workers (since people don't live around the port)
- Standards are health protective, so health is not an issue
- Maybe the issue is what standard is used to evaluate
- Use standards set by the American Lung Association (for example)
- People do have the chance to determine the standards used
- EIR does not evaluate impacts to specific groups – Latinos and children
- Because the project is ill-defined, it is hard to say what should and should not be included in the pathway.
- Indirect displacement is difficult to measure – it is hard to know this is the exact reason someone moved.

### **Neighborhood Livability (Facilitator: Jonathan Heller, Human Impact Partners)**

- Employment effects are hugely important
- Probably should include economic effects at the local, regional, state, national, and international level
- Pathways are interlinked extensively
- General agreement that everything was covered in the 9 pathway diagrams
- Cumulative impacts are important to consider
- Existing regulations that Ports have to respond to should be listed in the Scope, including the California Coastal Act (chapter 8) and Tides Land Trust

### **Port Revenue (Facilitator: Zoe Heller, U.S. EPA Region 9)**

Diagram on notes:

3 Es (Economic, Environment (health), Equity) – in the center

encircling the above – national container fee; national goods movement; Hwy tax money; FEB  
[?] money; Port money; Prop 84

Other revenues

Project regional

Goods movement (airports, rail, ports)

Rail→X

Port→X

Airports→X

Revenue

## ***Excercise 2a – Provide Feedback on Pathways***

### **Process :**

1. Participants will be giving feedback on 3 pathways. There will be 3 rounds of this exercise (20 minutes each), with each round building on the prior conversation with new questions (aka 'world café')(only 2 rounds if not enough time). Tara will also explain the 'law of 2 feet' – participants are welcome to move around at any point to another table or also stay the whole time at 1 table – depending on their interests. Again, markers are on the tables and participants are encouraged to record their own comments directly on the pathway diagrams and on the easel paper on the wall.

2. Facilitators will sit at the table with their assigned pathway/s. The pathway diagram will be on the table and 2-3 sheets of easel paper hung on the wall beside the table for participants' notes.
3. Tara asks participants to choose and go to their first table/pathway for round 1.
4. Round 1: Facilitators introduce first the pathway and then the discussion questions one by one. Facilitators can remind/encourage participants to record their own thoughts on the easel paper.
5. Facilitators can record any additional comments in the notes section below.

### Discussion Questions:

1. *Is the pathway an accurate representation of the health impacts of concern?*
2. *What is missing from the diagram? Is there anything we could eliminate?*

### Feedback:

Air (Delde Reyes)

Is the pathway an accurate representation of the health impacts of concern?

- Generally, yes, needs more detail.

What is missing?

- Missed work days
- Children missing school due to illness, schools lose money based on absenteeism, parents need to miss work to take care of sick kids.
- These digrams tend to be worst-case scenario – diagrams need to reflect benefits as well
- List of impacts re climate change too narrow
- Link to climate change and the project – the scale is very challenging
- Access to health care in the community and the cost to the community due to health care for chronic disease
- Pathways need to reflect varying impacts as scale of population changes, i.e., blocks, to neighborhoods through regional

Noise (Tom Kelly)

- (Note: This discussion included comments about other pathways besides noise)
- Industrial emissions from port facilities like petroleum transfer and storage facilities (example of an operation not considered for air pathway)
- U.S. Borax – a private port that is separate from the Port of LA and the Port of Long Beach.
- Missing the benefits of projects – the purpose and need.
- Consideration of discretionary cargo that could go to any location.
- Pile driving and concrete crushing (grinding concrete for use as aggregate in new concrete) are very noisy.
- Trucks in neighborhoods are noisy and unsafe (wide/dangerous turns
- Based on the size of the truck, its not from either Port
- Truck routes may be a valid concern, but outside either Ports' jurisdiction.
- Long discussion of the Hobart Yard, a locomotive facility with many noise concerns, located about 20 miles from the Port. The Hobart Yard is a locomotive repair facility.
- Off-site container storage are noisy (may have called it a container inspection facility)

Water (Steven John)



- Santa Monica/Venice Beach contamination due to aerial deposition
- Port Trust responsibility to prevent tidelands/ocean water contamination from Dominguez Water Sheds
- Off-tidelands owned property water run off ie truck staging areas

#### Traffic & Rail (Jen Lucky)

- the goal of port operations is to move to a system that increases on-dock loading, to decrease the number of trucks on the streets
- It's the Port policy for trucks to remain on truck routes, what are the reasons that trucks are veering from truck routes (for example on arterial streets)?
- It's not the trucks that are specifically causing traffic issues, community residents are afraid to drive on the 710 (because of trucks I am assuming – JL), so they divert to arterial streets b/c of safety issues
- Projects like SR47 will relieve congestion
- The purpose of guidance and assessment is to look at the worst case, so incremental differences in small changes to project alternatives are already accounted for in the EIR
- There is a disconnect in what you are looking at from the left to the right of the pathway diagram – are the same metrics used in the studies to the left vs. the data that you would be collecting to make the link to the right of the pathway? In CEQA metrics are defined, and used in the studies to determine impacts – not sure this is the case with HIA (that metrics used to determine links are same as those used to measure impacts)

#### Employment (Denise Dickinson)

- change in local economy – can have access in local community
- do the new jobs offer benefits
- fully expand the change in access box (clumps a lot together, would like more broken out)
- would like to see it link to changes in mental health
- \*group thinks eliminate change in access to material needs
- \*one box for healthcare, housing

#### Displacement and Neighborhood Infrastructure (Marnie Purciel)

- Land use planning is non-existent. Connect environmental representatives with land use representatives.
- Look at businesses that grow related to port activities (e.g., container storage yards)
- Is there any effort to look at compatible land uses.
- In an environment that includes auxiliary uses – these uses should be included in an analysis
- There is no mention of measurement of educational outcomes.
- Communities have a right to a set of goods and services available in their areas.
- Would be good to know what currently exists in terms of a set of goods/services, so we can know how and what would be ideal to augment these.
- Communities are already overburdened—need to shift the focus/dialogue from analyzing the *additional* environmental burden
- What set of things could be done to diminish the environmental burden?
- “Reduce” should be in the dialogue
- Should be an emphasis on new technologies and mitigation measures (buffer zones, R&D)
- Outreach to other partners – the ports could learn from other countries
- Invasive species introduced by ships travelling around the world – this impacts habitats.

- Do we know what has already happened as a result of port expansion? Have people left? What are the lessons learned?
- Include quality of life issues in a baseline assessment
- From a project standpoint, what is the contribution of port and others to the problem (e.g., refineries)
- There is a difficulty regarding the big picture vs. a project specific focus – how do you address the holistic approach through a specific project.
- Link effects the port does have control over to projects (linkages – port project and community)
- Cumulative analysis – perhaps strategies/mitigations should fall into someone else’s realm (e.g., land use planner)

#### Neighborhood Livability (Jonathan Heller)

- There are lots of effects from revenue from Port
- Include indirect jobs (e.g., restaurants) in analysis
- Other pathways feed into Neighborhood Livability
- Perceived impacts are important and should be captured (from community input)
- The advantage of this pathway is that this is what community talks about and the way they talk about it. Using this kind of pathway will increase public participation.
- Someone questioned who comes to community meetings – only people that are unhappy, not people who think the neighborhood is getting better. So, doing a survey would be more appropriate than just having a community meeting.
- Different views of whether property value should be included in the pathway. One person thought that this is subjective and could lead to litigation. Another person thought that it was important to include because there are studies showing links between property values and environment.

## ***Exercise 2b – Relative Magnitude of Pathways***

### **Process :**

1. Participants are invited to sit at a second table of their choice (try to spread evenly across the 8 tables).
2. Facilitators stay at same table with same pathway. Facilitators introduce pathway to new group and share some key points from previous group's discussion. Facilitator first asks if this new group would like to add anything to that discussion.
3. Then the facilitator introduces the second round of questions one by one. Again, facilitators can remind/encourage participants to record their own thoughts on the easel paper.
4. Facilitators can record any additional comments in the notes section below.

### **Discussion Questions:**

1. *Based on your experience, what can you say about the magnitude of the impact of this pathway?*
2. *Which specific paths in this pathway represent impacts that would affect the most people or have the biggest health impacts?*

### **Feedback:**

#### **Air (Facilitator: Deldi Reyes, U.S. EPA Region 9)**

- In health review assessment: look at what's missing, what is the impact on health endpoint, such as change in rate of asthma.
- Need to understand, what are the proper metrics. For example, with greenhouse gases, we need to build new tools to look at annual change. Are we using the right metrics to get to health impacts? Even for qualitative conclusions? The assumption is that the baseline is static but it's not.
- concerned about source apportionment and "link" to exposure. This is not well understood. EPA has not even approved a standard for diesel emissions. Regarding what's measured, we need an evidence base to select the metric. These are fundamental research questions.

#### **Noise (Facilitator: Tom Kelly, U.S. EPA Region 9)**

- Train noise from Port in neighborhood.
- Not all train traffic is from the port, and local traffic is often not an issue (i.e. reduces noise and rail traffic) for new rail lines.
- No emission (electric) trains, acknowledge that noise can still be an issue for electric trains
- Mag-lev (magnetic levitation) trains make little noise

#### **Traffic & Rail (Facilitator: Jen Lucky, Human Impact Partners)**

- Different (separate) pathways are needed for rail and trucks (should not be lumped together). For example, increasing rail could lead to fewer trucks on the road, and thus improve ped. and bike accessibility, though may have other impacts to air and noise. Truck and other vehicle traffic and rail also differ in their impacts on congestion
- Would be interesting to relate VMT to pedestrian and bike traffic and safety - what models could you use to do this?

- Community mitigation funds from Port projects could be used to improve bike and ped. Access.
- VMT is already focused on a great deal in CEQA, especially related to trucks.
- Congestion is also a focus of analysis under CEQA, with an emphasis on impacts to arterial traffic
- Ped. and bike could be a good area for an HIA to focus on, since it is not as prominently looked at in EIR's, and EIS's.
- There are opportunities for community participation when looking at congestion (qualitative accounts of local experiences dealing with congestion; truck counting, etc.)

#### **Employment (Facilitator: Denise Dickinson, U.S. EPA Region 9)**

- expand jobs beyond area – local, regional, national
- citywide benefits
- how do we weigh benefits
- Change in jobs at the port has an impact on local business and the economy
- Need to account for jobs that are impacted by port activity. (for example there are 1 million jobs that are generated just from the port of long beach). Need to look at impacts to jobs on a local, regional and national level
- 24/7/365 impacts
- impact severity over distance
- We noticed that the pathways were “worst case scenarios”, will the HIA then address them with positive mitigation measures?
- (Alternative assessment) \$'s, who owns issue?
- Regional, state, federal impacts need to be considered. This is very local-centric. Pathways biased toward negative.
- Port expansion leads to more jobs. Jobs have a positive impact on access to health care. Better access to H.C. can lead to better health management.
- Positive regional economic impact associated with port expansion
- QUALITY OF LIFE STARTS WITH A JOB!!
- What is the value of a GOOD Job?
- What negative economic impacts can happen with risking millions of jobs?
- Increases in jobs results in:
  - Less crime, domestic abuse, addiction
  - More tax revenues for police, parks, fire, etc.
- Include “child development” in brown boxes=health outcomes.
- Include types of jobs (e.g. jobs don't necessarily include benefits)
- Long term vs short term jobs?
- Employment changes – secondary effects on other issues such as traffic/commute, AQ due to traffic/commute

#### **Displacement and Neighborhood Infrastructure (Facilitator: Marnie Purciel, Human Impact Partners)**

- Data: goods/services, land use, potential mitigations
- Are we confident we have the data and knowledge that allows us to make decisions based on analysis→NO
- Data exists that things are linked, but will not get to...[sorry, missed the last part]
- There is a fine line between academic/scientific explanations [this doesn't really make sense, but I don't have more in my notes]

### Neighborhood Livability (Jonathan Heller)

- The pathway diagram has implied directionality (negative impacts highlighted)
- HIA should be thought of as a conflict resolution tool, so having an implied directionality is problematic for this
- Community Identity is an important aspect to capture
- Port is increasing capacity/density, not physically expanding, so initial boxes on pathway diagrams should be changed
- Educating community should be a recommendation. The community is not aware of things the Ports are doing to improve neighborhood livability, so advertising these things is important.
- Public perception of Neighborhood livability could be incorrect, so community participation/forums could be used as a tool for education.
- Include mobility (walking, etc.) in the pathway – mobility is related to livability
- Include regional and state economy in pathway diagrams (not necessarily related to livability)
- Community support for projects at the Ports could be realized through increased communication and partnership
- Data sources/methods?
- Community meetings
- Surveys
- How do you measure change in community livability (real and perceived)? A community survey?
- Changes in property values may be subjective, may be other factors influencing, there is potential for mitigation

### *Pathway feedback (notes made on the diagram)*

#### Water (Facilitator: Steven John, U.S. EPA Region 9)

- add box (change in land)→ added box
- add box (change in contaminated sediment/cleanup)→ added
- change text→ changed text in one box to "...from all sources including dredging and air deposition"
- change text→ changed text in one box to "...native marine wildlife habitats"
- remove box (change in food supply)→ removed box
- remove box (contamination of water supply)→removed box
- remove box (change in nutrition-related health)→ removed box
- remove box (contamination through ingesting contaminated water)→removed box

#### Employment (Facilitator: Denise Dickinson, U.S. EPA Region 9)

- remove "STDs" text→ did not do this because access to healthcare could be related to preventing STD spread
- add box (Housing)→ did not do this because housing is already included in access to material needs.
- Changed everything else on the pathway as indicated

#### Port Revenue (Facilitator: Zoe Heller, U.S. EPA Region 9)

- add a box (change in port revenue)→ did not make this change because this language is in the main project change box.
- Remove box (change in use of public programs)→ made this change
- Remove box (change in communicable disease) → did not make this change because a change in funds for public programs would impact communicable disease rates.

- Examples noted on diagram:
- POLB tidelands money (up to 10%) gives a portion of net revenue to City of Long Beach to use for tidelands areas (along the coast)
- POLA money is separate from the city and used at the discretion of POLA (but tidelands trust is a requirement)
- Impact:
- Yes, there is an impact and the magnitude is high, but is currently not measured.