Town of Beacon Falls
Planning and Zoning Commission
Public Hearing Minutes
March 21, 2024
C/O Town Clerk
10 Maple Avenue Beacon Falls, CT 06403
(Subject to Revision)

Members Present: Michael Pratt (**MP**), John-Paul Dorais (**JPD**), Marc Bronn (**MB**), Jack Burns (**JB**), Jonathan Conte (**JC**), Steven Orloski (**SO**), William Fredericks **(WF)**
Members Absent: Michael Rupsis (**MR**)
Others Present: Community Planner Molly Johnson (**MJ**), Town Planner Keith Rosenfeld (**KR**), Town Attorney Vin Marino (**VM**), Attorney Dominick Thomas (**DT**) representing Hawks View, Luke Sofair with JohnPaul Garcia Engineering (**LS**) representing Hawks View Subdivision, JohnPaul Garcia Engineering (**JPG**) representing Hawks View Subdivision, 38 members of the public, 5 members of the public via TEAMS and 1 member of the media.

1. **Call to Order/Pledge to the Flag:**
   MP called the meeting to order at 7:03 PM.

2. **Public Hearing regarding the proposed item below:**
   a. PZC-10102022-SD: Hawks View: Application for the proposed subdivision utilizing 19.3 acres to be divided into 12 building lots at the end of Haley Ridge Road – Attorney Dominick Thomas (**DT**) Representing Hawks View:
   DT I am here to address the issue that was brought up at the last meeting concerning the request that this commission ordered the applicant connect to, and claiming this commission has the power to, require the applicant to connect the waterline to the (proposed) subdivision from Burton Road and Haley Ridge Road at a distance of approximately 1,500 feet. I am here to present that section 4.12 does not give you (Planning and Zoning Commission) the authority to order a water line to be extended that far under your Zoning Regulations. What I was presented with was an opinion that interpreted 4.12 to state that even though the first sentence says, "In promoting public health, safety, and welfare public water should be provided to any lots in any subdivision located within 200 feet of a public water supply" and it goes on to state that the applicant should pay for Aquarion Water Company based upon their location and the size of the nearest watermain. The opinion of the board is that the public water supply is the public water supply map which I was provided with. Then there's a period and you go to the next sentence, which the next sentence clearly says, in my opinion, that the public water supply is the main, not whether you are near a service area or not. One of the reasons is where did the 200 feet come from? That's found in almost every subdivision regulation and its source is in the public health code. Your next page is the public health code regulation, Section 19-13-B51m (Well Permits). In subsection B says "No water supply well permit shall be given by the director of health: (1) To premises used for human occupancy when a community water supply system having at least fifteen service connections or regularly serving at least twenty-five individuals is deemed available if the boundary of the parcel of

property in which the premises is on or will be located on is within two hundred feet, measured along a street, alley or easement, of the approved water supply: or (2) To non-residential premises, where the water may be used for human consumption, when a community water supply system having at least fifteen service connections or regularly serving at least twenty-five individuals is deemed available if the boundary of the parcel of property in which the premises is on or will be located on is within two hundred feet, measured along a street, alley or easement, of the approved water supply."

So that is the source of where the 200 feet came from. How has that been interpreted? I was able to find a court case, from 2004, in which the director of health was demanding the developer connect to the waterline which, as the crow flew, was 200 feet and there was supposedly the ability to go through an easement to connect them to the waterline that was in an adjacent condo project. As you can see from the highlighted language, it says the evidence was received stating that the Old Saw Mill subdivision is within 200 feet of the Twin Oaks Condominiums water supply measured along a street, alley or easement. The evidence is conclusive that the community water supply is not within 200 feet. In other words, they're talking about the main – in this (Hawks View) situation if you went along the streets, alleys, or easements it would be 1500 feet. So, in fact, the court ruled no you cannot demand it because its 200 feet to the water supply.

The next page of my presentation is a blow up (screen shot) of the water supply map. If you notice the legend says service areas of community public water systems. In other words that tells you who is your water supplier – Aquarion, Regional Water, whoever it is in that area. It does not at all define where the mains are. Which is why your 4.12, in the next sentence says once you're within 200 feet then you have to contact Aquarion to find out the exact location of the main. Even in your regulation, when it's within 200 feet, the commission has the right to look at it and say maybe that 200 feet is in such a nature if its typography or maybe the line has to go through wetlands or something else. So, you have that discretion and if you look at the regulations that discretion is also in the regulations per Department of Public Health.

The second one is, I wanted to show where the water main runs - it's at a point of Haley Ridge Road and Burton Road and that's the reason it's over 1,500 feet. I then did a little more research of my own, I went to your GIS and clicked on these lots (pointing to presentation on papers) then I went and looked at the property description of when the homes were built – the homes that have the circle around them and the homes that are Xed out, which are all apart of Haley Ridge Subdivision, was approved in 1998 and for some reason when you go through and check the records the 4 lots under the circle have public water, the 17 lots on Haley Ridge Road do not have water and those don't even have fire hydrants or fire tanks. Now you have to look at the actual

numbers involved – to run that water line requires 1,200 linear feet of water line to run it through existing Haley Ridge Road and into that site. You then have to install hydrants, curb boxes, it would require a pump station, when you add everything together, you're talking about a potential cost, give or take, of 1.2 million dollars. So, when you divide 1.2 million by the 12 lots and net out some normal expenses, you're at $85,000 - $95,000 per lot cost for the water line which makes the project cost prohibitive in that situation as opposed to putting in wells. That is the specific purpose of the rest of the language in 4.12 and when you look at the public health code regulation. You can see in Subsection C number 2 there could be an exemption if construction problems warrant such actions. So, the options are 1) It could be a condition of approval the applicant could appeal the condition, and the other option and I'm not issuing a threat, I'm stating a fact, 2) In order to make it economically feasible you would have to then increase the density substantially, the only way to do what is to put approximately 175 units which would reduce the cost to about $7,000 or so per unit and make it financially feasible. Given the circumstances I think the concern needs to be, as it always is, for appropriate fire safety – I know fire tanks are an option, Oakwood Estates had 23/24 lots and has 3 fire tanks. This has 12 lots so it would appear 1 or 2 fire tanks of substantial size would be sufficient to deal with it. I can answer any questions anyone may have.

VM I think there is something that needs to be addressed and that is whether or not Section 4.12 is applicable because where Attorney Thomas and I disagree is the applicability and what triggers the applicability of section 4.12. Even if it's applicable the commission has the discretion to not require it. Section 4.12 doesn't say you must bring it water, it says if it's applicable the commission shall consider the following things in deciding whether or not to bring it in. What attorney Thomas is saying in the first sentence is let's look at this decision that is based on Department of Public Health regulations as to why Section 4.12 is not applicable, and I think this is why we disagree. In that case, what the court said specifically was the directors of Department of Public Health's reading, measuring "as the crow flies" disregards the specific language of the DPH regulation that measures along the street line, so the Director of Health said you're wrong in requiring the connecting of the water because you can't go "as the crow flies" under your regulation, you have to go by the language of the regulation. We aren't here talking about the Department of Public Health regulation; we're talking about your subdivision regulation. In the case Attorney Thomas refers to supports my argument – what we're saying is, this is a question of regulation interpretation, as the court says why the Director of Public Health was wrong in requiring the hook up is because he did not follow the regulation. Under 4.12 the first question is – Are

you within 200 feet of a public water supply? That is not a defined term. When we interpret statues or regulations, we look at its plain language to see what the intent was when it was adopted. If you read this paragraph in its entirety, it's inconsistent to conclude that the phrase public water supply means the same as the location of the nearest extension of an Aquarion main. Because if the two meant the same thing, as a legislative body, you would've used the same language. By using different languages you're presumed to have meant different things. Otherwise, it doesn't make sense when you're reading the paragraph. Question one in the first sentence says this is when this regulation is triggered – when you're within 200 feet of a public water supply. So, I went to DPH Website and clicked on what they define as public water supply, there are multiple portions of this subdivision that are within 200 feet of what is defined by Department of Public Health as a public water supply. That means yes you have the authority under Section 4.12 to require it, it doesn't mean you must require it. For all the reasons pointed out by Attorney Thomas there may be a good reason not to. This commission said when this provision is triggered now when we render our decision, we must consider the following things and among the things we must consider is the location of the nearest main. It could be cost prohibitive, the cost doesn't override the public, health safety and welfare concerns but if gives you that discretion. In the first instance what we disagree on is whether Section 4.12 is triggered, in my opinion it is, in Attorney Thomas's opinion, it isn't. We are of the same mind that if you require it, it is at your discretion. The reason we differ in the conclusion of whether Section 4.12 is triggered or not is because my reading of 4.12, I differentiate between the phrase of "within 200 feet of public water supply and the location of the nearest main", why wouldn't you have said we will consider the two as identical and then used identical language. That's where the difference is in our positions. This subdivision is within a 200-foot distance, it may not be from a street line, but you don't need to go by street line by the language of your regulations. I don't believe the case he cites is supportive of his decision, I believe it is in supportive of mine because the director was wrong because he measured as the crow flies, and he needed to measure along the street line because that's what the regulation says. Your regulation doesn't say that it just says 200 feet from a public water supply. So, my position is if it's any distance at any point within 200 feet you trigger Section 4.12. He presented evidence that says its cost prohibitive then you can decide OK this is not necessary because there are reasonable alternatives to accomplish the same goal to protect the public health, safety, and welfare.

KR I want to add in one of the reports you received that the land use staff has questioned the validity of the length of the cul-de-sac and the addition of a roadway into a cul-de-sac at the end of this new subdivision. There are rules for

allowing it and there's also rules that make it do the length is curtailed due to typography, public safety, etc. I would like to see the same debate we just had with the public water supply with that issue as well. I think that's something the commission would value as well.

DT The reason I gave the case was not with respect to the public health director, it was not to show that they didn't interpret their own regs right, it was to show the language that I highlighted on the 2nd page – which in defining their regulation, which I think is similar to what you have, is that the distance was over 1,500 feet and the court was saying the distance you have to count is 200 feet and the 200 feet had to be in a certain way. Attorney Marino is correct that in your regulation you do not state 200 feet along roads, so you would have the ability to say well our 200 feet is as the crow flies but there's a lot of things you have to consider. I believe the decision ends at the end of 200 feet, the proof that there's no main within 200 feet. The other problem you run into is if you say if you're within 200 feet of that colored area, the question becomes what happens if you're 200 feet outside the area, clearly this commission has no authority to order hook up to Aquarion outside of Aquarion Service Area. There are two sides, that's my position. I would hope that even if you do determine you do have the jurisdiction you would look at the reasonable facts here and determine that it's not appropriate and the wells would be more appropriate in the circumstance. I was not presented with any issue about the dead end, but I do believe this subdivision could end in a way where it could connect to a public road as the development continues in the future.

MP Does anyone from the public have any comments?

Diana Timpano (**DT**) 7 Haley Ridge Road – **DT** Based on what you all just said – the wells, who makes the ultimate decision if they connect any kind of water line down our street? **MP** The commission, then from there they can appeal it. **DT** Who's involved in them breaking through our cul-de-sac and putting the pass road through? **MP** They have an application forward to extend the road. Right now, at the end of the cul-de-sac, there is a right of way to extend the road. **DT** But there's also entry to Fairfield Place from the other side? **MP** No it's not – when Mr. Edwards had the development together, he broke it off into two separate developments. There is only an easement for drainage and such. **DT** So there's not another entry place from Fairfield Place? **MP** No. **DT** So the intent is the ability to also build in that location? **MP** It's up to them. **DT** That being said, our rights on Haley Ridge Road, is this commission stating we have no legal rights to stop this from happening? At the end of the day, we choose our home because of the neighborhood, school district, our friends, family,

and what we build as a community within a community. Do we have legal rights, going forward, to stop this from happening? Or would it require us to gather and file class action to stop it? **VM** Property owners may have legal rights – ultimately what the commission will do is render a decision based on a number of factors that might include the length of the cul-de-sac, the extension of a waterline or use of wells, they could deny or approve. Once that decision is entered anyone that is classical aggrieved or statutorily aggrieved within 100-foot radius of this project could appeal to the superior court based upon how you believe your rights have been effected. **DT** That's not the question I'm asking, I'm asking them (commission). **MP** We have the right to listen to everyone that speaks and the commission weighs that in on their decision. **DT** That's what I wanted to clarify not from a legal aspect, I'm asking them. These are the people we as residents have voted in to represent us. So, the final decision is them. **VM** Their ability, depending upon the issue, they might sometimes have no option but to approve it if the project conforms with the regulations. Just because they vote yes does not mean they are personally in favor of it, but they are sitting in positions where they are statutorily legally obliged to act in a certain way that it conforms with the law. **DT** I understand that I just wanted to know what their ability is as far as power in this town is to yay or nay it. These guys here will take into account how the town feels, how the neighborhood feels, is it in our best interest. One of the biggest concerns is there's 80 acres here and 100 acres there and you're not doing anything yet, but you aren't saying you won't 5 years down the road. So, you basically turned a beautiful little street of a community within a community and blew it wide open and the people that chose those spots, just like you chose your home, safety, kids playing on the street, etc. So, what you're going to do is, if this happens and you blow that open, is take away a sanctuary for people to go and feel safe. I'm all for building new homes but at what cost and when does it stop? When do you start taking away from small towns, when people choose these places to raise their kids in a safe environment? You've now come in and changed the entire structure of a town and what it's known for. You are going to lose a lot of townspeople if this goes through. That's my opinion and I think it's probably everybody's opinion on that street and why? What's the purpose? I hope you take that into account. **MP** We will take that into consideration.

Brendan Rowley (**BR**) 23 Haley Ridge Road – **BR** When I bought my house it was a P cul-de-sac not a lollipop cul-de-sac so that future homes could be built, and I understood that, it was explained to me when I bought my house, so I don't have an issue with that. My question is when that road goes through, that P part of the cul-de-sac, what happens to that land? Does it become my land? Does it stay the towns? Does it get paved? **JPG** The intent is to take

what's being used to extend the town road, what will happen is – in every case I've been involved in, they take the asphalt off and put it back as grass, what's not used for the road, they'll fix the driveway so it comes in correctly, fix the entrance, and whatever you don't want as asphalt will revert to grass. I had one instance where the community got together and asked the developer to leave it as a basketball hoop so they left it asphalt so the kids could play basketball but, in most cases, whatever is not used for the road, whatever falls for your property, with the exception of the driveway, will be converted to grass. **BR** But the area they dig up the asphalt and replace, will that stay town property? Right now, the property line doesn't go up to the street. **LS** 23 Haley Ridge would get land as laid out in the original subdivision map. If you look at the original map that created your lot, you will get a certain allotment of land that preserves the 50-foot right of way through so that area is currently circled. You would get the area here. **JPG** Whatever we don't need you get back. **BR** The developer will grade it back, seed, etc.? **JPG** Yes.

Courtney Dolecki (**CD**) 14 Haley Ridge Road – **CD** We've worked with Hawks View via in person meetings with Charlie Smith and have emails between Mr. Garcia and Deb and Jason Palmeri about some agreements we came to for our property given the short distance separating our house from Lot 1, everyone was very kind to move the driveway to the other side of the lot to give a little more space and put in a 120 foot vinyl fence which we are grateful for however we want a condition of approval to make that legally binding. We've been told it's unnecessary but given the history of this land and unforeseen circumstances should something happen I need to cover ourselves; it is required otherwise we will appeal it and take it to superior court. **MP** I'm sure the applicants will do it if they've agreed upon it. **CD** It's been 3 months, and I still haven't gotten updated plans. **MP** they haven't gotten approval. **VM** To protect the record if there's something you can submit in writing. **JPG** We've modified the drawing. She has emails from the parties involved. **CD** I received a revised drawing on February 10th. **JPG** This set hasn't been revised yet. When the board approves a subdivision, if there are conditions of approval, we must issue a revised set, at that time we will issue a revised set with all the conditions of approval that will then become the record set for the subdivision. As one of those things the fence will be shown, and the house and driveway will be shown flipped. That's one of the conditions we have agreed to so that will be shown on the final set of record drawings for the subdivision. **MP** For the public hearing they submitted these plans with the application so he cannot modify it until we do our conditions of approval. **CD** So you're going to approve something that isn't finalized then they come back with a condition of approval? **MP** We say for this commission to approve this

XYZ needs to be completed, they modify their plans, it comes back, and we have to sign it. **VM** To raise some clarity – when there is a final approval, and the revised plans are submitted, you'll have the ability to see those because they are public record and at that point is when you should verify for yourself that your concerns have been addressed and if not, you can take appropriate action at that point. That would be the point to make sure those actions have been taken.

Angela Ruggiero (**AR**) 6 Haley Ridge Road – **AR** If there is public water put in, are the residents on Haley Ridge required to tie in? **MP** I believe it's 10 years, if it's connected within 10 years you need to pay the contractor back, if it's beyond 10 years it falls on Aquarion. It might be 12 years. **AR** That's my next question, if I decide I'm keeping my well I don't want public water? **MP** It falls on the contractor. **JPG** Just to clarify, if the water line gets improved and your well fails you will be forced by the Public Health Department to tie in. **AR** When you say fails, I had issues with my water this year… contaminated well etc. **JPG** That's not the same thing, if for some reason your well cannot be renovated, you cannot drill another well – you must tie in. That's a statute in the State of Connecticut. The contractor gets back a set fee, after 10 years Aquarion gets the money. The bottom line is no you do not have to tie in. I also checked with the assessor, in Beacon Falls there is no fee.

MJ I just want to confirm the Conservation Commission expressed interest in having the conversation about the open space. **JPG** We are more than happy to work with the Conservation Commission on that.

Motion made to close the public hearing at 7:57 p.m. by **JB/SO**. All ayes. Motion carried. Meeting adjourned at 7:57 p.m.

Respectfully submitted,

Nicole Pastor
Clerk, Planning & Zoning

4.10.2 Access:

Streets shall be of such elevation or shall be suitably protected as to allow access during flood; and

4.10.3 Preservation:

The Commission may, when it deems it necessary for the health, safety or welfare of the present and future population of the area, and necessary to the conservation of water, drainage and sanitary facilities, prohibit the subdivision of any portion of the property, which lies within the flood plain of any stream or drainage course. These flood plain areas shall be preserved from any and all destruction or damage resulting from clearing, grading or dumping of earth, waste material, or stumps, except at the discretion of the Commission.

4.10.4 All applications for subdivisions shall include base flood (100 year flood) elevation data.

The provisions of Section 4.9 also apply to the items in this Section.

4.11 Sewerage Facilities: The applicant shall install sanitary sewer facilities in a manner prescribed by the Town of Beacon Falls Water Pollution Control Authority (WPCA) standards and specifications. All plans shall be designed in accordance with the rules, regulations, and standards of the Town Engineer, Health Dept and other appropriate Agencies, and subject to their approval.

4.11.1 Sanitary sewerage systems shall be constructed where a public sanitary sewer system is reasonably accessible and the applicant shall connect to it and provide sewers accessible to each lot in the subdivision.

4.12 Water Supply:

In the interests of promoting the public health, safety and welfare of the people of Beacon Falls, public water supply shall be provided to lots in any subdivision located within 200 feet of a public water supply. The applicant shall obtain from the Aquarion Water Company the location and size of the nearest water main and shall indicate or note this information on the Site Development Plan. The decision by the Commission to require extension of the public water supply to serve the subdivision shall be based upon the location of the nearest extension of a Aquarion Water Company main, the adequacy of pressure and service, the proposed layout of the subdivision, the nature of the terrain of the subdivision and such additional information as the Commission may deem pertinent.

4.13 Curbs:

Bituminous curbs shall be installed along the edge of street pavement. The applicant shall consider the requirements in the Town's Storm Water Management Ordinance in locating bituminous curbs

Regulations of Connecticut State Agencies
Title 19. Public Health and Safety
Department of Public Health (2)
the Public Health Code of the State of Connecticut
Chapter II: Environmental Health
Water Supply Wells and Springs (Refs & Annos)

Regs. Conn. State Agencies § 19-13-B51m

Sec. 19-13-B51m. Well permits

Currentness

(a) Subject to subsections (b) and (c) below no water supply well permit shall be given until it has been demonstrated to the satisfaction of the director of health that public sewers are available or a subsurface sewage disposal system can be installed on the lot in compliance with Sections 19-13-B103a to 19-13-B104d, inclusive of the Regulations of Connecticut State Agencies.

(b) No water supply well permit shall be given by the director of health:

(1) To premises used for human occupancy when a community water supply system having at least fifteen service connections or regularly serving at least twenty-five individuals is deemed available if the boundary of the parcel of property in which the premises is on or will be located on is within two hundred feet, measured along a street, alley or easement, of the approved water supply: or

(2) To non-residential premises, where the water may be used for human consumption, when a community water supply system having at least fifteen service connections or regularly serving at least twenty-five individuals is deemed available if the boundary of the parcel of property in which the premises is on or will be located on is within two hundred feet, measured along a street, alley or easement, of the approved water supply.

(c) The commissioner of health services, or his or her designee, may grant an exception to subsection (b) above upon a finding that such exception will not adversely affect the purity and adequacy of the supply nor the service of the system or it is determined that:

(1) The community water system which serves the premises is unable to provide such premises with a pure and adequate supply of water: or

(2) If construction problems warrant such action.

Credits
(Added effective February 2, 1988.)

<Statutory Authority: C.G.S.A. § 19-13, transferred to C.G.S.A. § 19a-36 in Gen.St., Rev. to 1983>

2004 WL 3106051

UNPUBLISHED OPINION. CHECK COURT RULES BEFORE CITING.

Superior Court of Connecticut,
Judicial District of Litchfield.

AMERICAN DIMENSIONS, LLC
v.
Michael A. CRESPAN, Director of Health.

No. CV044000824S.
|
Dec. 14, 2004.

Attorneys and Law Firms

Sienkiewicz & McKenna PC, New Milford, for American Dimensions LLC.

Cramer & Anderson LLP, New Milford, for Michael A. Crespan.

Opinion

JOHN W. PICKARD, J.

***1** This is an action for mandamus brought against the defendant, Michael A. Crespan, New Milford Director of Health, by the plaintiff, American Dimensions, LLC, the owner of an eighteen-lot residential subdivision known as Old Saw Mill. The plaintiff prays that the defendant be ordered to issue well permits for lots 3 and 4 of the subdivision and any subsequent lots for which application may be made. For the reasons set forth below, the mandamus must issue.

The Old Saw Mill subdivision was approved by the Planning Commission of the Town of New Milford based upon plans for lots with individual on-site **water** supply wells. The plaintiff applied to the defendant for well permits for lots 3 and 4. Based upon directives received from the Drinking **Water** Division of the Department of **Public** Health ("Drinking **Water** Division") the defendant refused to issue the permits although he personally believed that the plaintiff was entitled to the permits. Because well and septic location are dependant upon each other, the defendant has also invalidated septic permits previously issued for lots 3 and 4 before he received the directive from the Drinking **Water** Division.

The defendant, as Director of Health, is charged by the provisions of C.G.S. Sections 19a-**200**, 19a-207, and 25-130 with enforcing the provisions of the **Public** Health Code within the Town of New Milford. This duty includes approving the location and design of **water** supply wells. C.G.S. Section 25-130 establishes the procedure for issuance of permits for construction of **water** supply wells; the Drinking **Water** Division does not have a statutory role to play in the issuance of individual well permits. The applicable portion of the statute provides that the driller shall submit the permit "... to the local director of health or his agent who shall sign such permit if said proposed **water** supply well conforms to the **Public** Health Code."

The defendant has refused to issue the well permits because of a directive from the Drinking **Water** Division that Department of **Public** Health Regulation 19-13-B51m(b)(1) precludes the issuance of a permit in these circumstances. [1]

Section 19-13-B51m(b)(1) provides, in relevant part, that:

> No **water** supply well permit shall be given by the director of health: (1) to premises used for human occupancy when a community **water** supply system having at least fifteen service **connections** or regularly serving at least twenty-five individuals is deemed available if the boundary of the parcel of property in which the premises is on or will be located is within two hundred **feet**, measured along a street, alley or easement, of the approved **water** supply ...

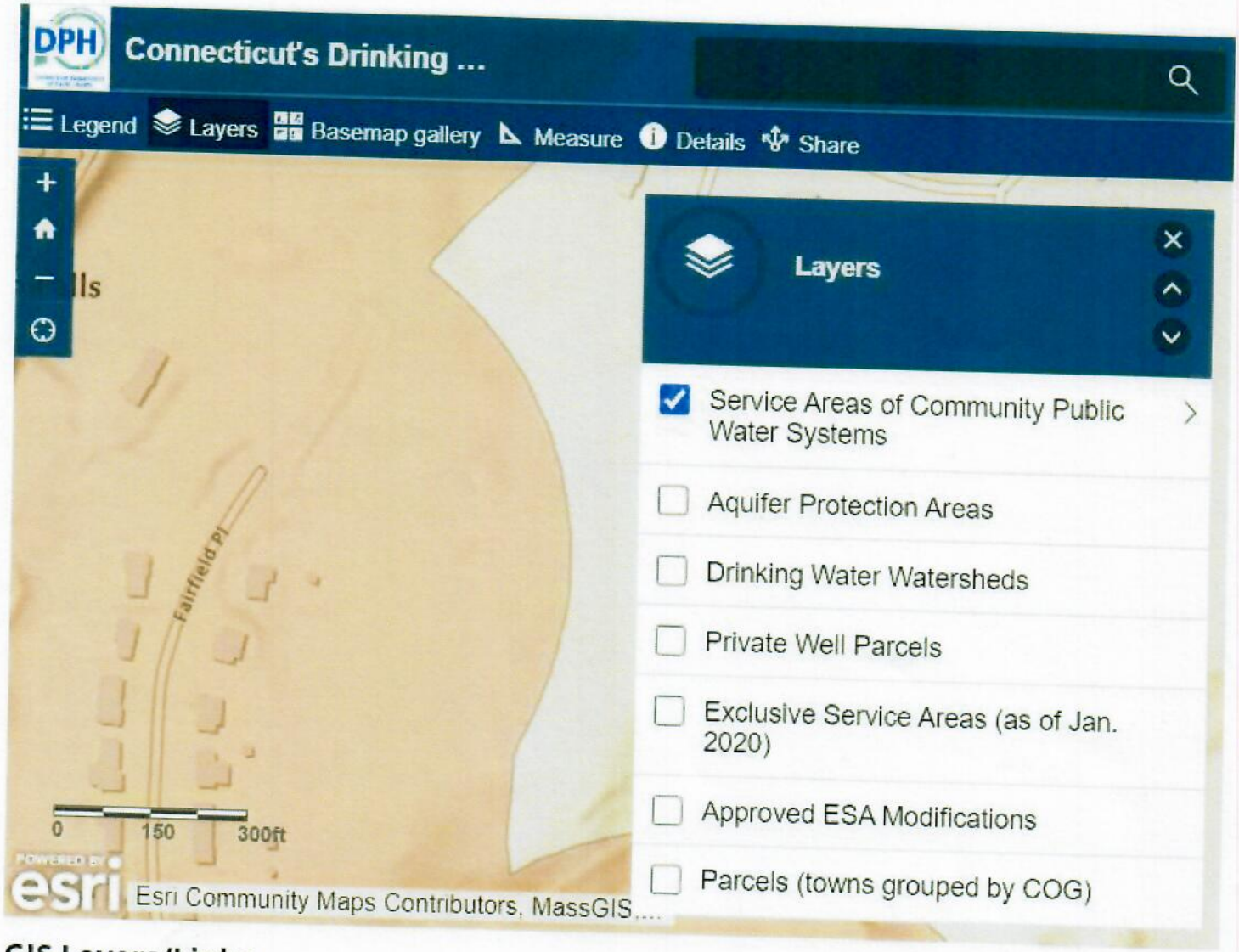
There is a community **water** supply system serving the Twin Oaks Condominiums on property adjacent to the Old Saw Mill subdivision. The directive from the **Water** Supply Division asserts that this adjacent Twin Oaks system must be "deemed available" for use by Old Saw Mill.

Footnotes

1 Initially the Drinking **Water** Division had also issued a directive that Department of **Public** Health Regulation 16-262m(b) **requires** the plaintiff to obtain a certificate of **public** convenience and necessity as a **water** company to serve the entire subdivision. The parties have filed a stipulation that the Drinking **Water** Division has reversed its position.

End of Document

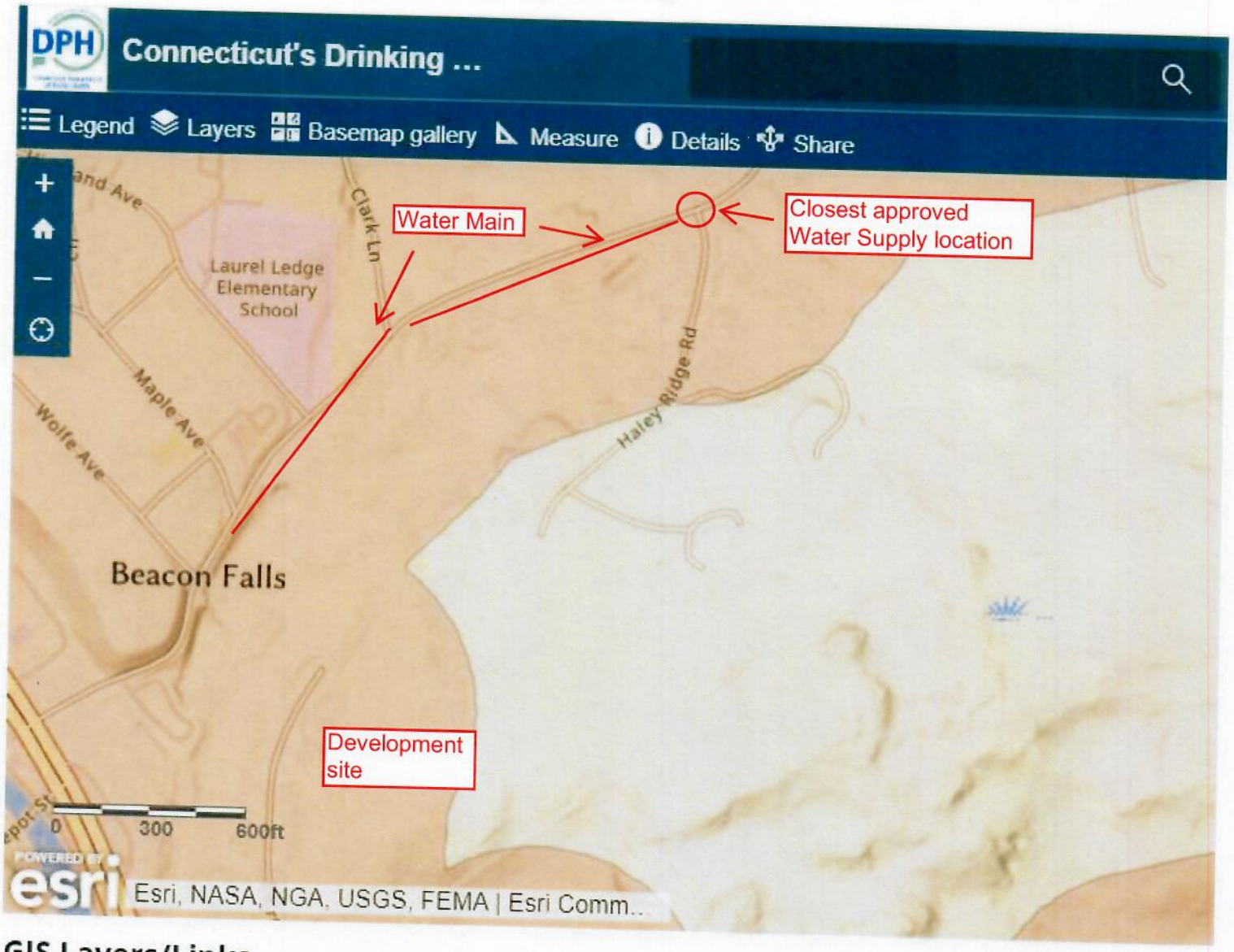
Public Water Supply Map



GIS Layers/Links

- Drinking Water Watersheds GIS Layer
- Aquifer Protection Area GIS Data
- System Service Areas GIS Layer

Public Water Supply Map



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