



# **Farmworker Housing Issues**

**November 7, 2023**

## **Farmworker Housing Working Group**

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# Background

- Board considered Island Grove Farmworker Housing Special Exception on 12/13/2022
- Special Exception was approved with numerous conditions added
- Board requested that Staff bring back a further discussion of farmworker housing at a future meeting
- Strategic Leadership Equity Cohort #1 recommended a Community Engagement Pilot Project out of Growth Management

**Community Engagement-Based Pilot of County Policy Review  
to Better Address Farmworker Housing Needs**



# Process

## **Community Engagement-Based Pilot of County Policy Review to Better Address Farmworker Housing Needs**

- County Team Prep Work
- Community Engagement Planning
- Community Engagement Implementation
- Outcome Reporting



# Process

## Community Engagement-Based Pilot of County Policy Review to Better Address Farmworker Housing Needs

- **County Team Prep Work Phase**

1. Form working group
2. Learn together:
  - Tools - Community engagement principles and practices
  - Farmworker realities and context – to build working group capacity and understanding to be able to engage communities with thoughtfulness and sensitivity
  - Regulations of Farmworker Housing – codes, comp plan, federal and state laws related to farmworker housing
  - Best practices in farmworker housing (2nd iteration of learning)
3. Draft underlying principles/values to guide project based on above learning (output of learning)



# Educating Ourselves

- Farmworker Codes
- Farmworker Housing Complexity and Relationships to Other Challenges
- Inclusive Community Engagement for Municipalities



# Community Engagement Definition

The practice of municipalities and system entities building relationships and partnerships, pathways and infrastructure so that public services allocated for residents are more fully integrated **with** community power needs neighborhoods and **interests**

**Equity is both an outcome and a process**



# Core Principle: Internal Organizational Change

External outreach and engagement is a reflection of the internal culture and organizational values and priorities. Outward facing racial equity work will only be successful if there is ongoing internal work, including for example:

- Increased understanding of equity, cultural competency and language access among staff and embedded in organizational culture
- Transformation of systems and processes to be more equitable
- Building up capacity to describe and analyze disparities and track change
- Increased opportunities for co-creating projects, processes and budgets with communities
- Transformation of the workforce so government looks like the community



# Types of Community Engagement

**Government can take on a range of different roles with respect to communication and decisions:**

- **building relationships without an specific objective, request or agenda**
- **informing the community of programs and policies**
- **listening and gathering feedback**
- **learning and collaborating together**
- **co-creating programs or policies together and**
- **following community leadership and decisions**

**Each of the above can meaningfully advance equity depending on the context. It is important to think carefully about what type of engagement is appropriate given government readiness and trust with communities.**





# Farmworker Housing

**Learning about  
Context, Conditions, Regulations, Enforcement, Possibilities**

**Leah Cohen**



**Agricultural  
Justice Project**

**A coalition of farmworker organizations; family-scale, sustainable and community-based farmers and farming organizations; food chain worker organizations; and organizations working in communities with limited access to good fresh food of their choice.**

## **Specific housing conditions to regulate/enforce (not comprehensive):**

- Site: buffers from livestock, standing water, toxic materials, odor, flies, noise, traffic, hazards
- Water: Access to clean water for use that is regularly tested and protection from hazardous water
- Space: adequate to prevent overcrowding, for socializing, eating with table and chairs and cookware/dishes, sleeping, recreating, space for storing clothing, toiletries , etc.
- Facility cleanliness: hygiene, garbage, refuse (ongoing)
- Structure: Safe, solid, weatherproof, AC and heat
- Visitation: access to resources
- Rights posted: contact info for support on exercising rights, language, visitation, phone, transportation
- Transportation- freedom of movement, public transport, alternative transport other than employer
- Cooking facilities
- Garbage/refuse
- Laundry facilities: health & safety issue, pesticides
- Fire safety/ first aid/disease
- Cost of housing: H-2A – employer provides; H-2B workers must find (e.g., \$1000 place going for \$2600 rented to workers separately)
- Buffers from toxic materials
- Isolation and control over housing

# Types of Farmworker Housing

Sub-standard Motel Rooms

Barricks style employer provided housing

Walk in Coolers

RVs, campgrounds, barns, shacks,  
vehicles, horse stables, chicken coops

Licensed and not licensed labor camps

Mixed development with dignified housing intent -  
for single people, families, homes – Florida Rural  
Neighborhoods – example of better practices in  
farmworker housing developments - not the norm.

Rental apartments on open market – affordability  
shortage

Rural Women Health Project reported to the BoCC in December 2022 that they have seen workers in these conditions using bed frames as grills to cook food as food provided by employers was insufficient for caloric needs of 10 to 14 hour days during harvest season.

*"I was living for approximately 2 months in a walk-in cooler with 5 other people. The space was too narrow. Of course it was not an appropriate place for people to live. When we'd ask for our pay, the boss would say 'Well, aren't you living in there? You're living for free but still ask to be paid for your work?'"*

- farmworker in Florida interviewed for [Hungry for Justice: Spotlight on the South](#)

# Policy & Cultural "Othering" of Farmworkers that is used to Justify Inequitable Treatment

- Exemption from Fair Labor Standards Act (farmworkers excluded in definition of workers for purpose of right to minimum wages)
- Exemption from National Labor Relations Act of 1935 which means farmworkers don't have the federally protected right to organize
- Immigration law in 1924 was changed to include "national origin" that would allow differential rights for those whose parents were from outside the US even if they themselves were born in the US
- Immigration visas for immigrants who do agricultural labor far fewer than needed – created a population with sub-standards rights and protections
- Guestworker programs isolate and provide different rights for workers, legally tie workers to their one employer
- Different housing codes for farmworker housing than is allowed for other community members.
- Framing Black and Brown bodies as better suited for hard and hot agricultural labor has carried through today to the idea that farmworkers (who are predominately people of color) do not need occupational heat stress legal protections
- Framing that immigrant laborers "can't assimilate"
- Labeling farmworkers as "unskilled" and not recognizing they are actually often farmers whose land was stolen or who were stolen from their land.

*"The state is using this crisis [Covid] to further entrench a racialized labor regime, undermining farmworker wages and access to citizenship, especially with the expansion of the H-2A guest worker program." - Xuihtecutli and Shattuck, 2021*

# Who are farmworkers?

Shifting trends throughout time:

Enslaved African agricultural experts: [Linda Lee's video](#) - expertise/skill

Sharecroppers and people imprisoned and leased to farm owners due to Black Codes

Latinx immigrant farmers fleeing home economies ruined by US free trade policies (legally & illegally) - DOL estimates just under 50% of farmworkers in US are undocumented immigrants, many speak languages other than English.

People imprisoned in modern prisons and jails and leased to food and farm companies for pennies/hour or no pay at all.

Fewer and fewer undocumented and previously documented agricultural workers (aging), more and more new guest workers, less migratory, visit family less often due to border control tightening

Interns, volunteers, students, often free labor (legally and illegally)

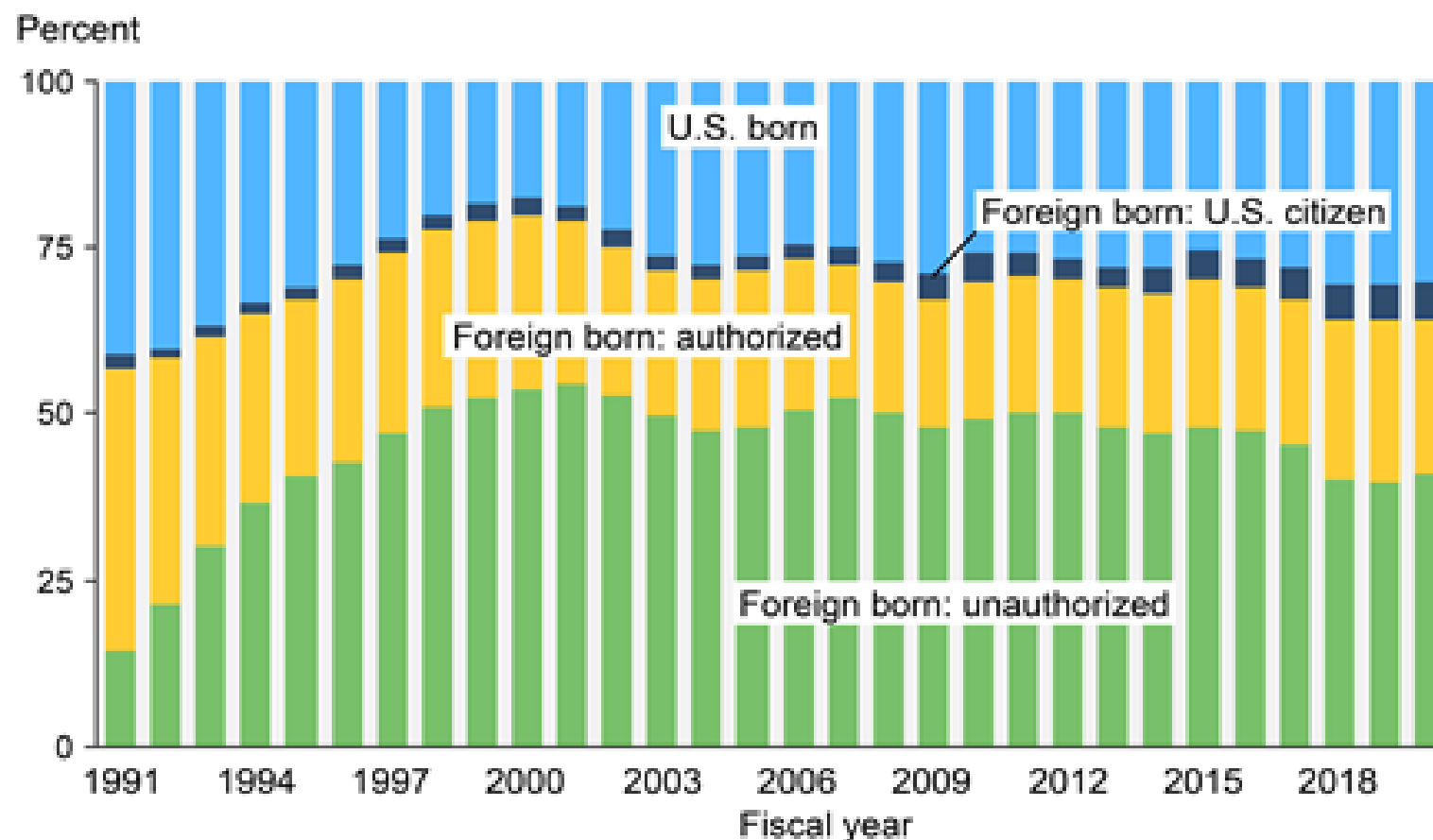
Low pay, few benefits and few legally protected rights other workers have (agricultural exceptionalism to labor laws – i.e., no federal right to overtime pay, no federally protected right to organize) (guestworkers are tied to employers - no freedom to change jobs)

Robin Lewy's video - [economics](#)

**Farmworkers are mothers, fathers, sisters, brothers, sons, daughters, community members, skilled agriculturalists, farmers, professionals, artists, herbalists, chefs, visionaries, and more. They are skilled workers.** Calling them unskilled facilitated exploitation.

# Some Demographics of Farmworkers

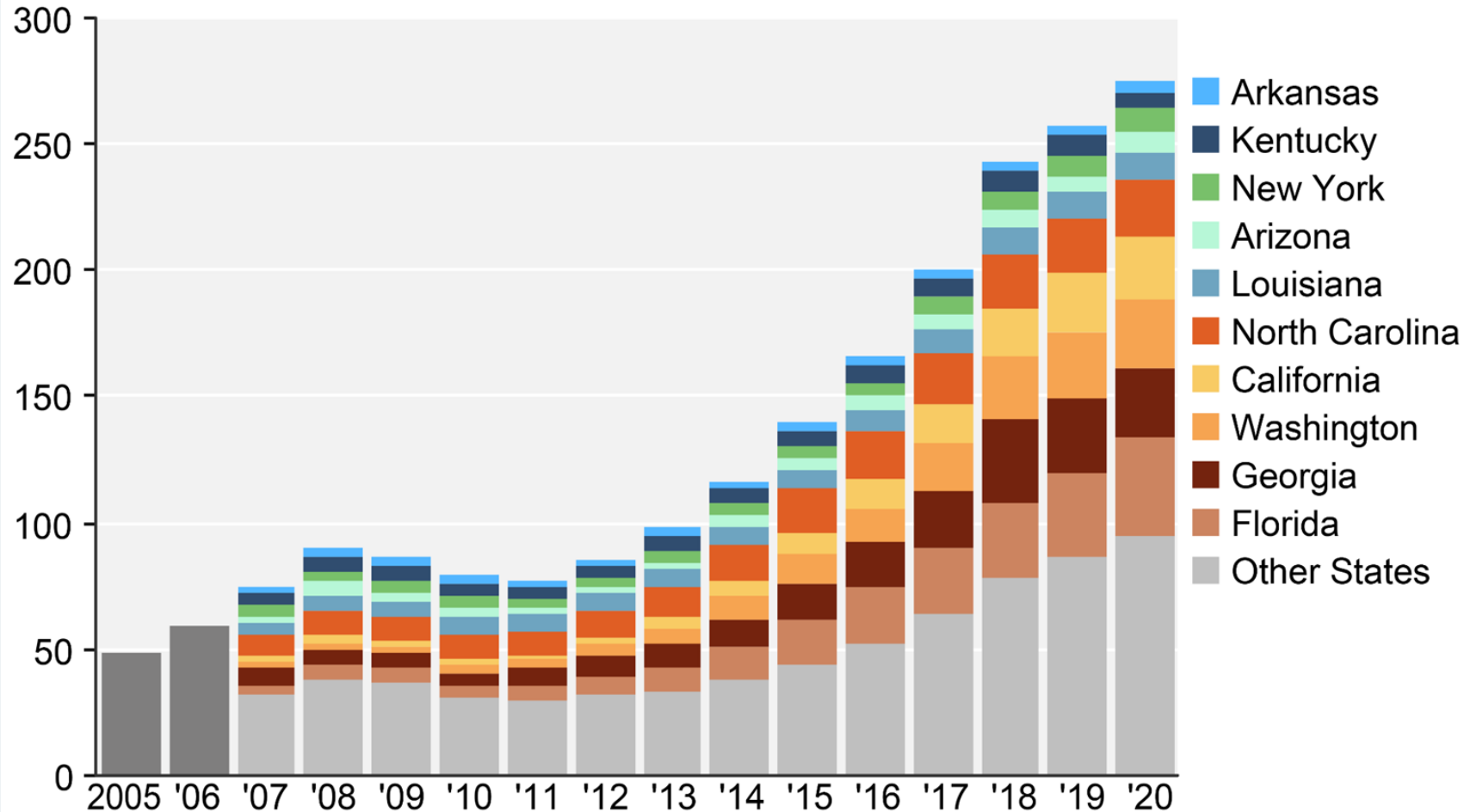
Legal status of hired crop farmworkers, fiscal 1991–2020



Note: Values for each year are 3-year moving averages to smooth fluctuations due to small sample sizes; e.g. data reported for fiscal 2020 are the average over fiscal 2018–20. U.S. born includes those born in Puerto Rico.  
Source: USDA, Economic Research Service using U.S. Department of Labor, National Agricultural Workers Survey.

## U.S. H-2A (temporary agricultural employment of foreign workers) positions certified by State, fiscal years 2005-20

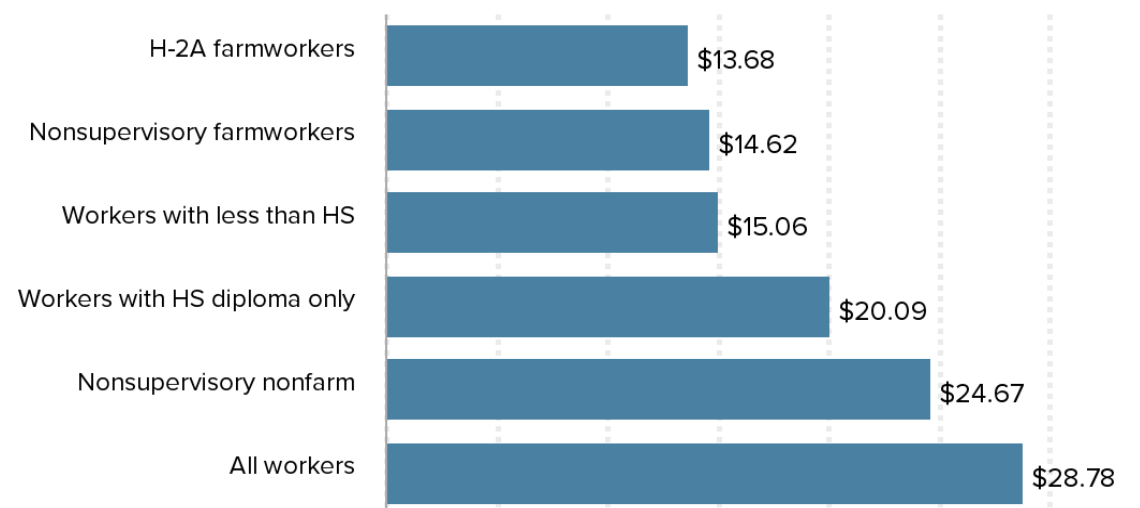
Seasonal positions certified (thousand)



Note: State-level data are not available for fiscal years 2005-06. The individual States included in the chart had more than 2,000 H-2A positions certified in fiscal year 2010.  
Source: USDA, Economic Research Service using data from U.S. Department of Labor, Office of Foreign Labor Certification.

## The farmworker wage gap in 2020: Farmworkers earn very low wages compared with other workers

Average hourly wage rate for farmworkers and H-2A workers compared with average hourly wages of other workers, 2020



**Notes:** All values are for 2020 and in 2020 dollars. HS = high school. H-2A wage is the national average Adverse Effect Wage Rate for 2020, as reported by the U.S. Department of Labor, and does not reflect the average wage paid to the H-2A workers who were ultimately employed in 2020. Nonsupervisory nonfarm workers' wage represents the average hourly earnings of production and nonsupervisory employees, total for the private sector, not seasonally adjusted. Nonsupervisory farmworkers' wage is the gross average hourly wage of field and livestock workers. Data for all workers, and for workers with a high school diploma and less than high school, can be found at the Economic Policy Institute State of Working America Data Library.

**Sources:** Author's analysis of USDA [Farm Labor Survey](#) data and nonfarm wage data from the BLS Current Employment Statistics survey; [EPI analysis](#) of CPI-ORG microdata; Office of Foreign Labor Certification [historical state AEWRs](#)



# Enforcement

BOCC asked about enforcement mechanisms at 12/13/2022 commission meeting – reportedly the health department has to inspect farmworker housing quarterly....however...

In Alachua County:

45 migrant labor camps in Health Department system

33 of which are hotels and 25 of which were not inspected in 2022 + 1 out of business

3 sites had unsatisfactory inspections (but often multiple inspections- others of which were satisfactory or incomplete)

Lack of unsatisfactory inspections does not necessarily mean better conditions - can mean less enforcement –chronic lack of inspection capacity & funding to enforce policy / protections.



Martha Elena Garcia Ambrocio, 22, sits in front of her mother. The two share their trailer with their husbands and five kids. Migrant farm workers face not the best living conditions just a few miles outside of downtown LaBelle, Florida. *The Gainesville Sun*

*“Regulators often don't take strong action against repeat offenders, and some counties are not as active in seeking illegal camps as others. Counties like Collier and Hendry have a large number of violations only because they are the most tightly controlled.”*

*Gainesville Sun, 2015*

# Recommendations made to BOCC on or before 12/13/22 by Farmworker Groups

## **Rural Women's Health Project:**

- 2 people/room maximum with 2 single beds with frames
- 1 bathroom per room
- Full kitchens in the units (even when food is provided by employers)
- Air Conditioning in housing
- Washers and dryers enough to allow workers to wash their own clothes (including washing out pesticides) at night
- Drinking water that is regularly tested for contaminants
- Space for recreation
- Inspections throughout the season to enforce health & safety regulations, not just when development is initially approved

## **Farmworker Association of Florida:**

- Living space to sit and eat that is not on the bed
- Closet or wardrobe with space for clothing and hygiene (not living out of suitcase)
- 1 bathroom / 4 people at a minimum
- Table and chairs (and space for it)
- Air Conditioning in housing
- Full kitchen access, including cookware, utensils, etc.
- Close to public transportation OR with access to transportation (including a driver) that is NOT controlled by employer
- Outdoor recreation space

## **Agricultural Justice Project – provided to staff prior at to BOCC at meeting:**

- Air Conditions in housing
- Postings of rights and regulations in accessible language
- BOCC controlled enforcement mechanism – inspections that are not based on or triggered by complaints
- More space: At least 100 square feet / person when rooms are meant to be both for sleeping and all daily life activities per OSHA standards
- Full kitchen facilities
- Access to laundry facilities
- Freedom of Visitor Access to farmworker's living spaces
- Ensuring protections from pesticide exposure with adequate buffers
- Incentives for smaller scale, local farms to be able to meet higher farmworker housing standards and rights and be able to compete – financial support mechanism
- That BOCC develop a process for reviewing such farmworker housing applications that includes consulting farmworkers and the groups that work closely with and are accountable to farmworkers.

# Support from Farmer and Multi-Sector Groups for Improved Farmworker Livelihoods and Living Conditions

The National Family Farm Coalition (NFFC) Farm Bill Platform includes fair wages for farmworkers, which, if included, would facilitate farmworkers paying for decent housing, if they have the freedom and control to choose where they live. Antonio Tovar from NFFC speaking about Florida agriculture after the devastation of Hurricane Ian in fall of 2022:

*“As in the case of homeowners, most farmers are underinsured. Many of the crops lost do not have the same benefits that staple crops do. But if farmers are uninsured, imagine how grim the future is for hundreds of farmworkers who depend on those crops; how damaged their houses, that tend to be already in poor condition...*

*...our system, starting with Ronald Reagan, turned its back to a progressive mixed economic model, instead preferring a brutal capitalist regime. It is going to take years to rebuild Florida, and even more to change our economic model...*

*...farmworkers need our solidarity; for the years to come, we must keep pushing for a food system that cares for the people who produce what we eat. **Family farmers, ranchers, fisherfolks, and all food chain workers must be elevated to the standard we have for doctors, lawyers, or engineers.**”*

## Based on learning so far:

### What do we want for farmworker housing that aligns with health and well-being of farmworker community members and entire community?

- Policy that gives farmworkers more control over their housing, their livelihoods, and their lives
- Integrate workers into communities as much as possible – counteract isolation and NIMBYism
- Ensure a diversity of types of **affordable** and dignified housing that considers life continuum of workers' needs, one of which should be policy that supports goal of home ownership
- Ensure code enforcement inspections are done regularly – do not rely on complaints-based code violation notifications, do not assume existing enforcement is sufficient
- Address access - including documentation requirements that limit access to subsidized housing
- Be careful (seek frontline community input) to consider implications for farmworker populations (for example, intersections with financial structures and obligations dictated by policy and priorities of different farmworkers – keeping costs down to send more money home or anticipate increased enforcement may result in condemned housing – ask where will workers live then?)
- Support for locally invested farms to provide dignified, best practice housing – develop partnerships.
- Work in partnership with best practice housing developers who understand context and are committed to equity for farmworkers.
- Recognize and support the role of higher worker wages in improving housing and other inequities.
- Leveraging public procurement commitment to the Good Food Purchasing Program/Valued Workforce.

Additional considerations anticipated from the next phase: community engagement.

# Examples of Better Practices:

- Rural Neighborhoods has developed and managed better farmworker housing in Florida for years in many cities.
  - Developments are mixed (singles, h2a, families, study hall, daycare center, etc).
  - Many lessons learned - such as installed dishwashers but it made rents too high
  - Has had to convert some of his units to h2a housing to generate enough funds to cover housing development costs (h2a housing is subsidized by the government under rental assistance program), but this resulted in increase in audits to verify legal documentation of residents
  - Critical to make housing developments flexible in future use. Agriculture in Florida unstable and labor shifting.
- Everglades Farmworker Village:
  - Aim: Affordable housing for farmworkers - development comprised 46 four-bedroom single-family **homes**, 83 three-bedroom duplex units, and 15 two-bedroom duplex units.

# Dignified, Safe, and Healthy Farmworker Housing is about more than Housing

Intersecting issues: legal status, low wages and lack of benefits, access to healthcare (including regulations regarding information gathering at healthcare facilities), access to services (related to isolation), access to food and culturally relevant food, whether living with family or not, legal rights (discrimination), language justice, exposure to environmental hazards, respect, education, fear of retaliation, lack of control and choice over housing conditions (when employer/contractor controls housing), cultural "othering" of farmworkers, and **farmworkers not having a say in public policy that greatly affects them**, and more

# Regulations of Farmworker Housing

## Jurisdiction

- Federal:
  - Department of Labor: [Migrant and Seasonal Agricultural Worker Protection Act](#), [Fair Labor Standards Act in Agriculture](#)
  - H-2A: [Temporary Agricultural Employment of Foreign Workers](#)
  - Occupational Health and Safety Rules: [Code of Federal Regulations 1910 Subpart J](#)
- State:
  - Limited Local Preemption: [F.S. 381.00896](#)
  - Department of Health Rules: [Chapter 64E.-14](#)

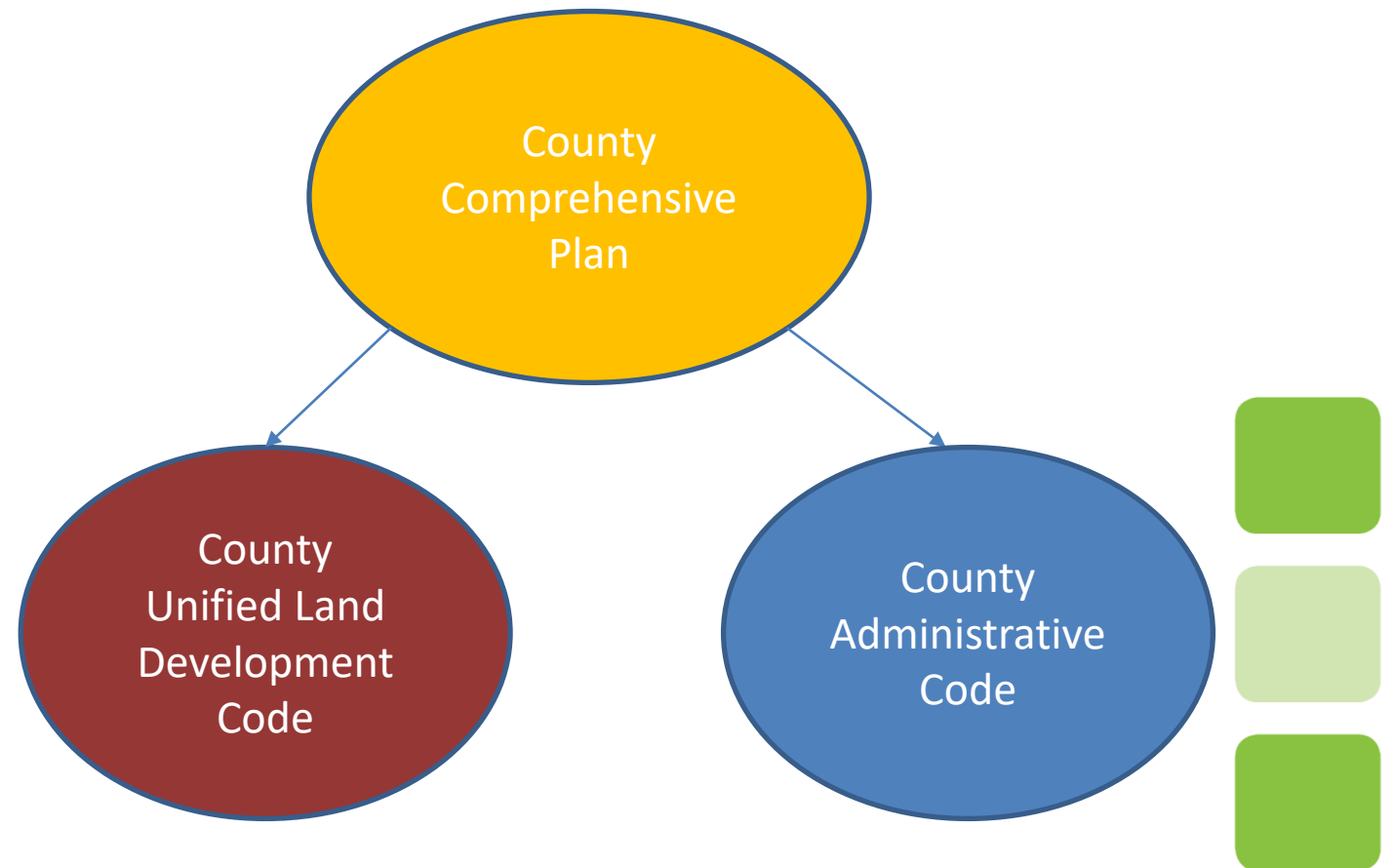




# Local Control of Farmworker Housing

## Jurisdiction

- Local:
  - Comprehensive Plan
  - Unified Land Development Code
  - County Administrative Code





## Alachua County Comprehensive Plan

- Housing Element:
  - Policy 3.1.2: *Alachua County shall continually review its development regulations to ensure that farmworker housing needs are addressed.*
  - Policy 3.2.1 *The development regulations shall allow densities for farmworker housing which may be in excess of the maximum densities shown on the Future Land Use Map. Such farmworker housing may be permitted by a special use permit or other appropriate mechanism to allow living accommodations of multiple farm employees and their families on one parcel without regard to duration, while performing agricultural labor.*
  - Policy 3.2.2 *Alachua County may require farmworker housing which exceeds the density permitted on the Future Land Use Map to be provided by manufactured homes which can be removed once the need for provision of farmworker housing is no longer present. Such ordinance shall ensure that all appropriate federal, state and local regulations are met especially with regard to the provision of water and wastewater facilities.*



# Local Control of Farmworker Housing Primer

- **Future Land Use Element (Recently Transmitted Comprehensive Revisions):**

- **Principle 1:** *PROMOTE SUSTAINABLE LAND DEVELOPMENT THAT PROVIDES FOR A BALANCE OF ECONOMIC OPPORTUNITY, EQUITY INCLUDING ENVIRONMENTAL JUSTICE, AND PROTECTION OF THE NATURAL ENVIRONMENT.*
- **Environmental Justice** *means that no group of people, including those from marginalized racial, ethnic, or socioeconomic groups or persons with disabilities, should disproportionately bear the cumulative negative social or environmental consequences resulting from land use decisions. Principles of environmental justice recognize historically that the largest proportion of environmental burdens come from industrial development, energy production facilities, disposal of waste, and transportation systems, and that these burdens often fall on the communities that are least able to withstand the impacts of them, i.e. poorer and marginalized communities. Environmental justice is a principle and practice that emerged historically from people of color organizing to protect their environments, community rights, lands, and health.*
- **Equity** *means redressing injustices that were previously incurred, fully incorporating all segments of the community in the decision-making and planning processes and establishing measures to prevent future inequities from occurring. Such efforts include expanding opportunity and promoting equal access to public services, providing equal service quality, ensuring procedural fairness, and striving for equal opportunity in such areas as education, health, employment, mobility, and housing. In the context of sustainability, equity refers to how burdens and benefits of different policy actions are distributed in a community. The more evenly they are distributed, the more equitable the community is, and this is reflected in economic, ecological, and social outcomes. Equity in sustainability includes putting forth efforts toward rectifying previous environmental injustices, avoiding environmental injustices going forward, and providing equal access to participate in sustainability activities and shape their development.*

- **Housing Element**

- **Policy 1.2.4** *Alachua County shall periodically review and evaluate its zoning and other regulations to ensure that requirements are reasonable and do not unduly limit opportunities for lower income groups to secure housing in desirable locations, consistent with the health, safety, and welfare of the public.*
- **Policy 2.4.1** *Ensure that all Alachua County housing meets minimum standards for health and safety in order to eliminate substandard housing conditions and provide for the structural and aesthetic improvement of existing housing.*
- **Policy 2.4.4** *The housing code shall not require displacement of persons from substandard homes where the homeowner occupant cannot afford the necessary improvements to meet the minimum housing code, and relocation or rehabilitation resources are not available. In the case of rental units, the housing code shall not require the displacement of tenants except in cases in which the code violations are potentially life threatening. This policy does not absolve landlords or home owners of the responsibility to maintain the unit in a manner that promotes the health, safety, and welfare of the tenant.*
- **Policy 3.1.1** *Alachua County shall encourage and promote the opportunity for each person to obtain housing of their choice, without regard to race, color, ancestry, sex, familial status, marital status, age, disability, housing status, religion, or national origin. Alachua County shall provide policies and programs which will help alleviate conditions resulting from discrimination. Chief among these shall be the continued enforcement of its Fair Housing Ordinance.*



# Local Control of Farmworker Housing Primer

## Comprehensive Plan – Community Health Element

- **GOAL:** PRESERVE THE HEALTH OF ALACHUA COUNTY RESIDENTS AND PROMOTE HEALTH IN ALL POLICIES AND SERVICE INITIATIVES AFFECTING ALL ASPECTS OF THE BUILT ENVIRONMENT, BY FACILITATING HEALTH CARE DELIVERY, IMPROVING THE EQUITY AND LIVABILITY OF THE COMMUNITY, AND PROVIDING ALL ALACHUA COUNTY RESIDENTS OPPORTUNITIES FOR ACTIVE LIVING.
- **Policy 1.3.1.1** Promote food security and public health by encouraging locally-based food production, distribution, and choice in accordance with the Future Land Use Element.
- **Policy 1.3.2.4** Alachua County shall work to implement the 2009 Hunger Abatement Plan and future updates, and shall provide technical assistance for community food access studies. Seek to eliminate food insecurity in Alachua County by 2050, and in the next 5 years increase community partnerships to meet food security goals. Encourage public and private efforts that support culturally appropriate food opportunities, including grocery stores, farmers markets, food banks and nutrition programs, especially to meet the nutritional needs of infants, children, elders, and other vulnerable populations in their neighborhoods.
- **Policy 1.3.3** Alachua County shall implement a Health in All Policies approach in order to use the built environment to promote the health and wellbeing of its citizens and reduce chronic disease
- **Policy 1.3.3.3** Alachua County will promote a healthy community by developing convenient, safe, and attractive opportunities for physical activity for residents of all ages and income, as part of their daily activities.
- **OBJECTIVE 1.5:** Develop a reporting and monitoring system of indicators designed to assess Alachua County's progress toward sustainable community health, including patient centered primary and hospital care, dental, mental, substance abuse and vision care.
- **Policy 1.5.1** To assist in planning and coordinating the delivery of countywide healthcare services, Alachua County Health Care Advisory Board, County departments and community partners shall utilize the Health Needs Assessments [HNA], the Alachua County Health and Human Services Master Plan and Alachua County Health Department DOH Strategic Plan, to provide policy-makers with findings and recommendations that help strengthen local partnerships and achieve health equity, and apply this information in decision making processes.
- **Policy 1.5.1.2** Use these community health indicators to inform long-term, mid-term (strategic), and budgetary decision-making. Recognize the importance of County services to local community character and sustainability by planning for and integrating public safety and health services into both short- and long-term planning and the budgeting process. Include consideration of health criteria and impacts as part of capital projects planning, to ensure consideration of health equity.  
where as health equity is defined as:
  - **Health Equity** - Everyone has a fair and just opportunity to be healthier. This requires removing obstacles to health such as poverty, discrimination, and their consequences, including powerlessness and lack of access to good jobs with fair pay, quality education and housing, safe environments, and health care.
  - **OBJECTIVE 1.9:** Alachua County shall support programs to reduce poverty and its effects.
  - **Policy 1.9.2** Contribute to efforts that help people meet their basic needs, maintain their independence as long as possible, and remain in their neighborhoods of choice.

# Local Control of Farmworker Housing Primer

## Alachua County Unified Land Development Code

- [Sec. 404.19. - Farmworker housing](#)

Farmworker housing may be allowed through special exception in all zoning districts except the C-1, conservation district, as an accessory use to an agricultural activity for workers employed on a full-time basis, and subject to the following standards.

- (a) *Types of farmworker housing.* Farmworker housing may be provided in the form of permanent dwellings or manufactured or mobile homes.
- (b) *Maximum density.*
  - (1) *Permanent dwellings.* Permanent farmworker housing shall comply with the density requirements of the zoning district in which the units are located.
  - (2) *Manufactured or mobile homes.* Dwelling units capable of being moved, including manufactured or modular housing, may exceed the density requirement of the zoning district provided that the following requirements are met.
    - a. Movable farmworker housing shall be accessory to the operation of an intensive agricultural activity.
    - b. The applicant shall submit the following materials:
      - 1. Evidence of a current agricultural ad valorem tax exemption issued by the Alachua County Tax Collector;
      - 2. An affidavit, signed by the owner or operator of the agricultural activity stating the farmworker housing shall only be used by fulltime employees of that activity; and
      - 3. A housing removal agreement with a requirement that all housing units shall be removed within ninety (90) days after the agricultural activity has ceased.

(Ord. No. 05-10, § 2, 12-8-05; Ord. No. [2020-25](#), § 2(Exh. A), 11-10-20)



# Next Steps

- Detail guiding Principles
  - County codes and programs should support *development of dignified housing for farmworkers that supports needs and priorities of farmworker communities, that recognizes all farmworkers living in Alachua county as part of the community, and that aligns with county comp plan commitments to wholistic community health.*
- Should Alachua County proceed with a revisions to farmworker specific code provisions and/or should farmworker housing needs be reflected in overall County housing policies?
  - Stakeholder Engagement
  - Consensus Building (with Language Access and Immigrant Liaison Specialist)
  - Back to the Board with Final Recommendations

