

SEWRPC Community Assistance Planning Report No. 295
A COMPREHENSIVE PLAN FOR THE TOWN OF POLK: 2035

Chapter XII

IMPLEMENTATION ELEMENT

INTRODUCTION

The implementation element is the last of the nine elements of a comprehensive plan required by Section 66.1001 of the *Wisconsin Statutes*. Section 66.1001(2)(i) of the *Statutes* requires this element to include a compilation of programs, in a specified sequence, to implement the recommendations set forth in the preceding eight elements. The *Statute* also requires this element to:

- Identify proposed changes to applicable zoning ordinances, subdivision ordinances, and official maps.
- Describe how each of the other eight elements of the comprehensive plan will be integrated and made consistent with other elements of the plan.
- Include a mechanism to measure the Town's progress towards achieving the recommendations of the plan.
- Include a process for amending and updating the plan. The *Statutes* require that a comprehensive plan be updated no less than once every 10 years.

Section 66.1001(4) of the *Statutes* sets forth the required procedure for adoption or amendment of a comprehensive plan, which includes:

- Adoption of a written public participation plan designed to foster public participation in the development of a comprehensive plan or a plan amendment.
- Approval of a recommended plan by a resolution approved by a majority of the full membership of the plan commission.
- Distribution of the draft plan for review and comment to:¹
 - Every governmental body located in whole or in part within the Town.
 - The clerk of each adjacent local government and the Washington County Clerk.
 - The Wisconsin Department of Administration (DOA).
 - The Southeastern Wisconsin Regional Planning Commission (SEWRPC).
 - The public library serving the Town (the Slinger Public Library and the West Bend Community Memorial Library).

The parties listed above must also be provided with a copy of the adopted comprehensive plan and the adopting ordinance.

- Adoption of the plan by an ordinance adopted by a majority of the full membership of the Town Board. Adoption of the plan by the Town Board must be preceded by at least one public hearing. A Class 1 notice of the hearing must be published at least 30 days before the hearing. Written notice must also be provided to persons who have applied for or been issued a permit for a nonmetallic mining reclamation plan, registered a nonmetallic mining site under Chapter NR 135 of the *Wisconsin Administrative Code*, or to owners or leaseholders of lands with nonmetallic resources who have requested notice of the hearing in writing, and to property owners that have filed a request for written notice under Section 66.1001(6) of the *Statutes*.

¹ The Wisconsin Department of Administration (DOA) has stated that both draft and adopted plan reports may be distributed in digital format, provided a paper copy of the report is available for review at the public library and at the Town Hall.

PLAN REVIEW AND ADOPTION

For any planning process, it is good practice to hold public informational meetings and hearings on recommended plans before their adoption. Such actions provide an additional opportunity to acquaint residents and landowners with the recommended plan and to solicit public reactions to plan recommendations. The plan should then be modified to reflect any pertinent new information and to incorporate any sound and desirable new ideas advanced at these meetings. Accordingly, a public open house for the Town comprehensive plan was held on September 1, 2009. A public hearing was also held before the Town Board on September 1, 2009. The Town provided public notice of the hearing before the Town Board in accordance with the requirements of the comprehensive planning law, and distributed the draft plan report to all of the parties specified in the law. The Plan Commission approved the plan on September 1, 2009. The Plan Commission resolution approving the comprehensive plan and recommending adoption of the plan by the Town Board is included in Appendix G.

An important step in plan implementation is the formal adoption of the recommended plan by the Town Board. Upon such adoption, the plan becomes the official guide to be used by Town officials in making development or redevelopment decisions. The plan should serve as the basis on which all development proposals, such as rezoning requests, subdivision plats, and certified survey maps, are reviewed. As required by Section 66.1001(3) of the *Statutes*, only those zoning actions or land divisions that are consistent with the plan should be approved. The Polk Town Board adopted this comprehensive plan on September 8, 2009. A copy of the adopting ordinance is included in Appendix H.

A public participation plan for development of this comprehensive plan was prepared in 2004, and adopted by the Town Board on October 12, 2004 (see Appendix B).

PLAN AMENDMENTS AND UPDATES

A comprehensive plan is a dynamic document created to guide future development decisions based on a future vision of the community, with consideration of past trends. From time to time there will be both internal and external changes that may require the Town to amend the adopted plan. The comprehensive plan should be reviewed periodically to determine if the plan accurately reflects current conditions and whether the plan is achieving its intended goals. If, through this process, it is determined that the text, maps, or other features of this plan are unsatisfactory, the Town Board may amend the plan.

This plan should be amended in a manner similar to its original development, with citizen participation prior to any change. Indeed, the comprehensive planning law requires that any plan amendment follow the same procedure as that followed for the adoption of this plan, including adoption of a public participation plan, a public hearing, approval of the plan amendment by a resolution of the Plan Commission, adoption of the amendment by an ordinance of the Town Board, and distribution of the plan amendment and adopting ordinance to the parties listed in Section 66.1001(4) of the *Statutes*. The Town may consider adopting an “umbrella” public participation plan to be used for all plan amendments.

The Town Board, upon recommendation of the Town Plan Commission, may consider (but is not obligated to approve) amendments to the Land Use Plan Map (Map VI-4 in Chapter VI). The Town Plan Commission and the Town Board will consider the following questions when considering approval of a land use plan map amendment:

- Is the proposed amendment consistent with the vision, goals, objectives, policies, and programs of this plan?
- Will the proposed amendment benefit the Town?
- Is the proposed amendment compatible with surrounding land uses?
- Are public streets and other necessary public services available, or planned to be available in the near future, to serve the proposed amendment?

A more comprehensive review and update of the plan is recommended at least once every 10 years (Section 66.1001(2)(i) of the *Statutes* requires that comprehensive plans be updated at least once every 10 years). The 10-year update should use, to the extent practicable, an up-to-date data base. Each 10-year update should also

include an extension of this plan for an additional 10 years to continually accommodate 20 to 25 years of Town growth.

CONSISTENCY BETWEEN THE COMPREHENSIVE PLAN AND TOWN ORDINANCES

Section 66.1001(3) of the *Statutes* requires that the following ordinances be consistent with a unit of government's comprehensive plan by January 1, 2010:

- Official mapping established or amended under Section 62.23(6) of the *Statutes*.
- County or local subdivision regulations under Section 236.45 or 236.46 of the *Statutes*.
- County zoning ordinances enacted or amended under Section 59.69 of the *Statutes*.
- City or village zoning ordinances enacted or amended under Section 62.23(7) of the *Statutes*.
- Town zoning ordinances enacted or amended under Section 60.61 or 60.62 of the *Statutes*.
- Zoning of shorelands or wetlands in shorelands under Section 59.692 (for counties), 61.351 (for villages), or 62.231 (for cities) of the *Statutes* (shorelands in the Town of Polk are regulated under the Washington County shoreland zoning ordinance).

Beginning on January 1, 2010, the Town will need to use this comprehensive plan as a guide to be sure that implementation of the Town zoning and subdivision ordinances will not conflict with the recommendations of the plan. If a conflict is found or would result from a proposed action, the Town has the option of amending the comprehensive plan; however, plan amendments should follow the guidelines presented in this chapter and not be made arbitrarily.

The *Statutes* do not provide any guidance about how to determine if zoning and subdivision ordinance decisions are consistent with a comprehensive plan. Specific guidance on how to apply the Statutory requirement for consistency will, unfortunately, likely be provided over time through court decisions in lawsuits challenging the implementation of comprehensive plans by County and local units of government after the consistency requirement takes effect in 2010.

Although there have not been any Wisconsin court decisions regarding the interpretation of the consistency provision in the comprehensive planning law, in the case *Lake City Corp. v. City of Mequon*, 207 Wis. 2d 155, 558 N.W.2d 100 (1997), the Wisconsin Supreme Court needed to interpret what was meant by "consistent with" as used in Section 236.13(1)(c) of the *Wisconsin Statutes* (the Statute governing land divisions). According to the Wisconsin Supreme Court, "[t]he word 'consistent,' according to common and approved usage, means 'in agreement; compatible.' The American Heritage Dictionary 402 (3d ed. 1992). In other words, 'consistent' means 'not contradictory.'"

Zoning Ordinance and Zoning Map Amendments

Zoning Ordinance Text Amendments

It is the Town's intent that the Town zoning ordinance be one of the primary implementing tools of this plan. As such, it should substantially reflect and promote the achievement of plan goals, objectives, policies, and programs. A zoning ordinance is a legal means for both guiding and controlling development in the Town, so that an orderly and desirable pattern of land use can be achieved which is consistent with the plan and balances individual property rights with community interests and goals. The zoning ordinance contains provisions for regulating the use of property, the size of lots, the intensity of development, site planning, the provision of open space, and the protection of natural resources.

The Town zoning ordinance includes the zoning districts and other regulations needed to implement this comprehensive plan, including the land use plan map (Map VI-4 in Chapter VI). Table XII-1 lists each of the land use plan categories on Map VI-4 and the corresponding zoning districts. A summary of zoning districts is included on Table II-1 in Chapter II.

No amendments to the Town zoning ordinance are necessary to implement the land use plan map and the other recommendations of this plan. The Town plan does, however, include a "Mixed Use" category, which is intended

Table XII-1

TOWN OF POLK LAND USE PLAN CATEGORIES AND CORRESPONDING ZONING DISTRICTS

Land Use Plan Categories (see Map VI-4)	Corresponding Zoning Districts
Agriculture or Rural Density Residential	A-1 General Agricultural District
Suburban Density Residential	R-1 Single- Family Residential District
Mixed Use ^{a, b}	B-1 Business District M-1 Industrial District I-1 Institutional District P-1 Park District
Industrial ^{a, b}	M-1 Industrial District
Institutional ^b	I-1 Institutional District
Park	P-1 Park District A-1 General Agricultural B-1 Business District ^c
Extractive ^{a, b}	Q-1 Quarrying District
Wetlands	All districts. Wetlands will be protected under Sections 2.08 and 2.09 of the Town Zoning Ordinance and Federal and State regulations. County regulations also apply to wetlands in the shoreland area
Primary Environmental Corridor (Overlay)	All districts. Primary environmental corridors will be protected under Sections 2.08 and 2.09 of the Town Zoning Ordinance and through use of the guidelines in Table V-14 in Chapter V

^aThe A-1 zoning district may be applied on an interim basis on parcels in agricultural use until an application is approved for a specific residential, commercial, industrial, or extractive use; however, certified survey maps to allow additional residential lots should not be approved unless the land use plan map is amended to change the plan designation to "Agriculture or Rural Density Residential."

^bThe mixed use, industrial, institutional, and extractive land use categories allow agricultural, general farming, pasturage, and cash cropping in addition to the business, industrial, institutional, and extractive uses specified in the Town of Polk Zoning Ordinance for the corresponding zoning district.

^cThe B-1 zoning district may be applied to commercial recreational areas (such as driving ranges) designated as "Park" on the land use plan map.

Source: SEWRPC.

to accommodate business, industrial, institutional, and other non-residential uses. It is envisioned that individual parcels within the area designated for mixed use would be placed in the business (B-1), industrial (M-1), institutional (I-1), or park (P-1) zoning district, rather than a variety of uses and zoning districts being placed on a single parcel. Applications to rezone parcels may be initiated by the property owner, Town Plan Commission, or Town Board in accordance with Section 11.00 of the Town Zoning Ordinance. Mixed use areas are located along major arterial highways to provide access to future businesses, to minimize truck traffic in residential areas, and to separate residential uses from the noise associated with major highways.

Zoning Map Amendments

Following adoption of this plan by the Town Board, the Plan Commission will initiate appropriate amendments so that the zoning map is consistent with the recommendations of this plan, particularly the land use plan map. The following changes will be considered by the Town Plan Commission and Town Board:

- Areas that are designated on the land use plan map for mixed use, industrial, or extractive uses but are currently used for agriculture and zoned A-1 may remain in agricultural zoning as long as the parcel remains in agricultural use or is not developed for urban use. Rezoning that would accommodate mixed use, industrial, or extractive uses shown on the land use plan map will be considered when a property owner submits a request for rezoning that specifies the proposed use of the property and, where required by the zoning or land division ordinances, a proposed site plan, preliminary plat, or certified survey map. Certified survey maps to create additional residential lots should not be approved in areas zoned A-1 and designated for mixed use or industrial uses unless the land use plan map is amended to place the area in the “Agricultural or Rural Residential” category.
- Areas that are designated on the land use plan map for suburban residential or industrial use and currently developed with such uses should be placed in the R-1 (60,000 square foot residential) or M-1 zoning district, respectively.
- The Town zoning map should be updated to apply the wetland conservancy overlay to nonfarmed wetlands. The Wisconsin Wetlands Inventory, a map of existing wetlands maintained by the Wisconsin Department of Natural Resources (DNR), was recently updated in Washington County. A comparison of wetlands identified in the Town by the SEWRPC year 2000 land use inventory² and the year 2005 DNR wetland inventory is shown on Map XII-1. The new DNR wetland inventory includes a “farmed wetland” category. “Farmed wetlands” are defined by the Natural Resources Conservation Service (NRCS) as “land that is partially altered but because of wetness, cannot be farmed every year.”³ The Wetland Conservation provisions of the 1985 Farm Bill, as amended, require agricultural producers to protect the wetlands on the farms they own or operate if they want to remain eligible for farm program benefits. Normal farming practices, including plowing, harrowing, planting, cropping, fertilizing, and grazing, can be conducted on farmed wetlands; however, there may be restrictions on drainage improvements in farmed wetlands. Farmers should consult with the NRCS before making any drainage improvements. Farmed wetlands may remain in the A-1 zoning district as long as the parcel remains in agricultural use.

All rezoning applications should be carefully reviewed relative to the land use plan map and the remainder of this comprehensive plan. If a proposed rezoning is not consistent with the plan, the rezoning should be denied. As an alternative, the Town Board may consider amending this plan. Plan amendments and rezonings may be reviewed concurrently, but a plan amendment should be approved prior to approval of the rezoning.

² *The year 2000 SEWRPC land use inventory was used as the basis for identifying the environmental corridors, isolated natural resource areas, and other wetlands shown on the Town land use plan map (Map VI-4 in Chapter VI).*

³ *Definition taken from the “Wetland Restoration Handbook for Wisconsin Landowners, 2nd edition, written by Alice L. Thompson and Charles S. Luthin, DNR Publication No. PUB-SS-989, 2004.*

Subdivision Ordinance and Official Mapping Ordinance

No needed changes to the Town Land Division Ordinance have been identified. The Town of Polk has not adopted an official mapping ordinance.

OTHER RECOMMENDATIONS

This plan will provide a framework to help guide the day-to-day decisions of Town officials and staff, particularly with regard to decisions on zoning and subdivision applications. Town officials intend to routinely consult the plan when carrying out Town government functions and developing the Town budget.

The Town also intends to make this plan available to land owners and citizens. In addition to providing a copy of the plan to the Slinger and West Bend libraries, the plan will be available on the SEWRPC (www.sewrpc.org) website.

PROGRAM PRIORITIZATION

As previously noted, the comprehensive planning law requires the Implementation Element to include a compilation of programs, in a specified sequence, to implement the recommendations set forth in the other required plan elements. The Town of Polk Plan Commission reviewed the programs developed in the previous seven elements (there are no programs recommended in the Issues and Opportunities Element) and developed a relative priority ranking for their implementation. Recommended priorities for implementing programs are presented in Table XII-2. Any new programs recommended in this plan must be individually reviewed and approved by the Town Board through the annual budget process prior to implementation.

CONSISTENCY AMONG PLAN ELEMENTS

The comprehensive planning law requires that the implementation element “describe how each of the elements of the comprehensive plan shall be integrated and made consistent with the other elements of the plan.” All elements of this comprehensive plan were prepared simultaneously by the same staff with great care given to ensure internal consistency among the various elements. All element chapters were reviewed by the Town of Polk Plan Commission. There are no known inconsistencies among plan elements.

PROGRESS IN IMPLEMENTING THE PLAN

Annual Report on Plan Implementation

The Town Plan Commission will undertake a general plan reevaluation once a year, which may include a brief description of activities conducted to implement the plan and a list of plan amendments approved by the Town Board during the year.

Comprehensive Update of the Plan and Maintenance of Inventory Data

The Town will conduct a formal review of the plan at least once every ten years.⁴ Based on this review, changes or updates should be made to sections of the plan that are found to be out of date and goals, objectives, policies, or programs that are not serving their intended purpose. Any changes or updates should follow the process for plan amendments required by the *Statutes*. The Town may choose to work with the Washington County Planning and Parks Department and/or SEWRPC to maintain and update inventory data compiled as part of the multi-jurisdictional comprehensive planning process.

⁴ *The Town is required to update the comprehensive plan at least once every ten years by the State comprehensive planning law.*

Table XII-2

**TOWN OF POLK COMPREHENSIVE PLAN
IMPLEMENTATION PRIORITIES**

Note: Priorities were determined by the Town Plan Commission and reviewed and approved by the Town Board. Each program was rated on a scale of 1 to 3, with 1 being the highest score possible and 3 being the lowest score. The average score for each program is noted in parenthesis at the end of the program.

Implementation programs receiving a priority rating of 1.50 or lower (highest priority for implementation):

- **Program:** Retain Town zoning as the primary means of regulating land uses in the Town. (1.29)
- **Program:** Lay out streets so that all vehicles, especially emergency vehicles, can travel in a safe and efficient manner. (1.33)
- **Program:** Continue to work with Washington County to regulate nonmetallic mineral extraction in accordance with the County's nonmetallic mining reclamation ordinance; and continue to enforce requirements of the Q-1 (Quarrying) district in the Town zoning ordinance. (1.43)
- **Program:** Continue to work with Washington County to administer and enforce the requirements of the Town's erosion control and stormwater management ordinances. Particular care should be taken where development is proposed on slopes of 20 percent or greater (shown on Map VI-3 in Chapter VI). (1.43)
- **Program:** Continue to enforce the Town building code to ensure adequate insulation, heating, and plumbing. (1.43)
- **Program:** As required by State law, continue to use the Wisconsin Information System for Local Roads (WISLR) and continue to update road ratings.(1.43)
- **Program:** Continue to cooperate with Washington County in the implementation of Chapter 25, Sanitary Code, of the *Washington County Code of Ordinances*, which includes the regulation of private on-site wastewater treatment systems (POWTS) in the Town. (1.43)
- **Program:** Identify suitable areas for business and industrial development on the Town land use plan map (see Map VI-4 in Chapter VI). (1.43)
- **Program:** Continue to implement the site plan review requirements of the Town zoning ordinance for business and industrial uses. (1.43)
- **Program:** Continue to work with Washington County and SEWRPC to implement desired recommendations from the Washington County Jurisdictional Highway System Plan (Maps VIII-2 and VIII-3) and the Transportation Improvement Program. (1.50)

Remaining implementation programs, listed in relative rank order:

- **Program:** Continue to allow a wide variety of agricultural uses in the Town in accordance with the requirements of the A-1 (General Agricultural) district in the Town zoning ordinance. (1.57)
- **Program:** Continue to enforce regulations regarding site suitability for development (such as suitable soils and topography) included in the Town Zoning Ordinance and Land Division Ordinance. (1.57)
- **Program:** Continue to cooperate with Washington County to ensure the County has reviewed proposed land divisions for compliance with the County Land Division and Sanitary Ordinances relating to land suitability, wastewater treatment and disposal, and other applicable requirements. (1.57)
- **Program:** Notify Washington County when a certified survey map (CSM) is submitted for a land division adjacent to a County highway, and request County input regarding the appropriate right-of-way for and access to the highway. (1.57)
- **Program:** Work with school district officials, on request, to explain the type of permits required from the Town before selecting and buying a site; the recommendations of the Town land use plan map; and other information that would assist the districts in planning for future school facilities. (1.57)

**Table XII-2
(continued)**

- **Program:** Continue to maintain the Town park adjacent to the Town Hall. (1.71)
- **Program:** Conform to existing topography, if possible, when constructing new streets. (1.71)
- **Program:** Work with Washington County to complete the procedure necessary for Town participation in the Washington County Multi-Jurisdictional Dispute Resolution Panel. (1.71)
- **Program:** Cooperate with the State Historical Society of Wisconsin and the Washington County Landmarks Commission as those agencies conduct historical surveys to identify historically significant structures and districts in the Town and methods to protect them. (1.86)
- **Program:** Continue to participate in the annual bridge inspection program conducted by Washington County. (1.86)
- **Program:** Work with existing housing agencies to identify programs and potential funding sources to assist homeowners with making needed repairs, including improvements to meet State and Federal lead-safe standards. (2.00)
- **Program:** Work with the Washington County Health Department to enforce State public health Statutes and County ordinances concerning dilapidated, unsafe, or unsanitary housing that poses a human health hazard. (2.00)
- **Program:** Explore a partnership with Washington County for recycling programs and facilities, including establishment of household hazardous waste collection sites and facilities. (2.00)
- **Program:** Work with OWLT and other Nonprofit Conservation Organizations to protect primary and secondary environmental corridors, natural areas, critical species habitat sites, and other endangered species habitat areas. (2.14)
- **Program:** Consider connections to existing or future development on adjacent parcels when reviewing site plans, preliminary plats, and certified survey maps. (2.14)
- **Program:** Work with Washington County and private service providers, where appropriate, to improve public transportation for persons with disabilities to increase access to jobs and community activities. (2.14)
- **Program:** Review the Regional Water Supply Plan once it has been completed and consider amending this plan to incorporate recommendations supported by the Town. (2.14)
- **Program:** Consider incorporating desired policies from State long-range transportation planning efforts, including *Connections 2030*, into Town of Polk plans. (2.17)
- **Program:** Consider preparing a Town stormwater management plan to provide for comprehensive and coordinated stormwater management facilities and measures. (2.29)
- **Program:** Initiate contacts with Washington County and adjacent communities prior to constructing new public facilities or initiating or expanding Town services to determine if there are opportunities for joint facilities or services. (2.29)
- **Program:** Cooperate with Washington County and adjacent communities when approached to consider joint service agreements or facilities. (2.29)
- **Program:** Allocate sufficient area for residential development on the Town land use plan map to accommodate the anticipated population of the Town in 2035. (2.57)
- **Program:** Work with government agencies and developers to implement creative ideas for providing low and moderate income housing in the Town while maintaining appropriate densities. (2.71)
- **Program:** Consider conducting a needs assessment and adopting an impact fee ordinance for facilities provided by the Town. (2.71)
- **Program:** Continue to maintain Town parks and develop additional parks and facilities as needs are identified and funding becomes available. (2.86)

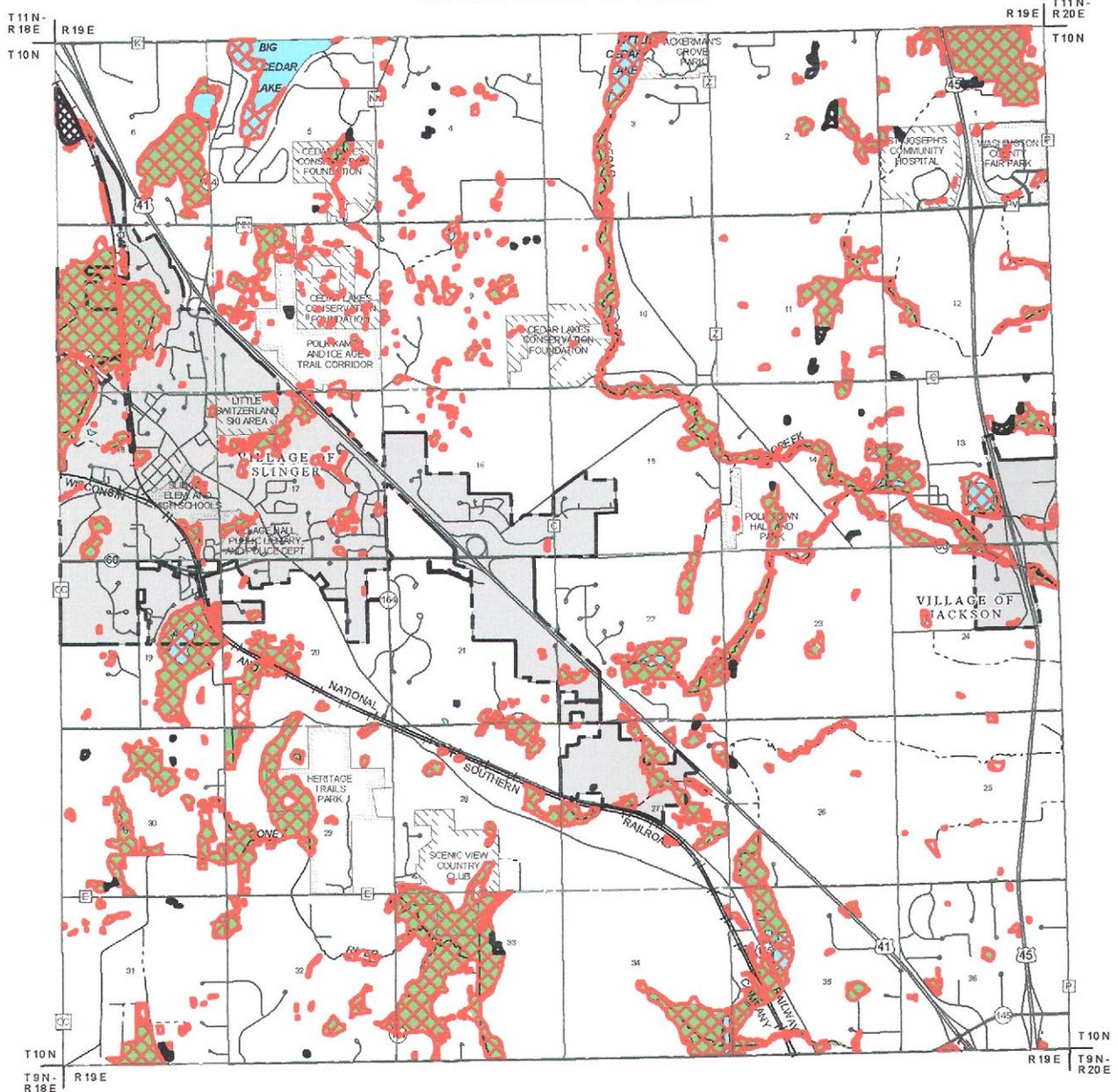
Coordination With Washington County Comprehensive Plan

Washington County has also adopted a comprehensive plan. The comprehensive planning law does not require that town, city, or village comprehensive plans be consistent with the County plan. The law does require, however, that County shoreland zoning and subdivision ordinances be implemented in a way that is consistent with the County comprehensive plan and that Town zoning and subdivision ordinances be implemented in a way that is consistent with the Town comprehensive plan. Because Washington County must review subdivision plats within the Town under the County subdivision ordinance, and ensure that a proposed plat is consistent with the County comprehensive plan, as a practical matter it benefits the Town if the Town plan is consistent with the County plan.

On August 10, 2004, the Washington County Board of Supervisors adopted 2004 Resolution 35, which established criteria regarding the incorporation of town land use plan maps into the land use plan map adopted as part of the Washington County comprehensive plan. The resolution states that the County will accept a Town land use plan if the plan is in “substantial agreement” with the objectives, principles, and standards of the regional land use plan prepared and adopted by SEWRPC. The Planning, Conservation, and Parks Committee (PCPC) of the County Board was assigned the responsibility for determining if each town plan was in substantial agreement with the regional land use plan, based on a recommendation from SEWRPC. The Town of Polk plan was found to be in substantial agreement with the regional land use plan, and was therefore incorporated into the County land use plan map. The Washington County Board of Supervisors adopted the Washington County Comprehensive Plan on April 15, 2008.

The Implementation Element of the Washington County comprehensive plan provides that amendments to Town land use plan maps will be incorporated into the County plan, through an amendment process, if the Town plan continues to be in substantial agreement with the regional land use plan. Section 66.1001(4)(b) of the *Statutes* requires that the Town provide a copy of all plan amendments to Washington County. The County will be responsible for determining if the amendment is in substantial agreement with the regional plan, based on a recommendation from SEWRPC. If determined to be in agreement, the County will amend its plan to incorporate the Town plan amendment into the County plan.

MAP XII-1 COMPARISON OF 2000 AND 2005 WETLAND INVENTORIES IN THE TOWN OF POLK



-  FARMED WETLANDS (2005 WETLAND INVENTORY)
-  NON-FARMED WETLANDS (2005 WETLAND INVENTORY)
-  WETLANDS (2000 LAND USE INVENTORY)
-  SURFACE WATER (2000 LAND USE INVENTORY)

SOURCE: WISCONSIN DEPARTMENT OF NATURAL RESOURCES AND SEWRPC.

