



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Eastern Region Office

4601 North Monroe St., Spokane, WA 99205-1295 • 509-329-3400

August 26, 2025

Kirk Klicker
106 Strawberry Lane
Walla Walla, WA 99362
klickers4@gmail.com

Re: Application Acceptance – Voluntary Cleanup Program

- **Site name:** Klicker Farm UST
- **Site address:** 106 Strawberry Lane, Walla Walla
- **Facility/Site ID:** 100004140
- **Cleanup Site ID:** 17262
- **VCP Project ID:** EA0402

Dear Kirk Klicker:

The Department of Ecology (Ecology) accepted your application to the standard process of the Voluntary Cleanup Program (VCP) for the Klicker Farm UST facility (Site). We applaud your initiative and welcome your interest in the VCP. This letter provides important information on how we will review your VCP cleanup project (project) at the Site.

Agreement

We completed and signed your standard VCP agreement for the project on August 26, 2025. This date is the effective date of the agreement. A copy of your signed agreement is [enclosed](#).

Identification Numbers

We have assigned a unique name and number to your Site. This information is listed on the first page of your standard VCP agreement ([enclosed](#)). When contacting us, please reference this information to identify your project.

Communications

Unless otherwise requested, we will communicate directly with you as project manager, as listed on your VCP application form. If you replace your project manager, or the contact information changes, please submit a completed [change of contact form](#).¹

The following site manager is our point of contact for your project:

Ted Uecker
Toxics Cleanup Program, Eastern Regional Office (ERO)
Department of Ecology
4601 N Monroe St
Spokane, WA 99205
509-342-5564
ted.uecker@ecy.wa.gov

Request for Written Opinion

As your cleanup progresses, you may request written opinions on your planned or completed remedial actions by submitting to Ecology:

- A completed [request for opinion form](#)²
- Remedial action plans and/or reports.

Reporting Requirements

When requesting written opinions, you must comply with the following reporting requirements to avoid unnecessary delays in the VCP process:

- **Licensing.** You must submit documents containing geologic and hydrogeologic work and engineering work under the seal of an appropriately licensed professional, as required in chapters [18.220](#)³ and [18.43](#)⁴ RCW, respectively.
- **Data Submittal.** You must submit environmental data to our [Environmental Information Management](#) (EIM) system.⁵ The [Toxics Cleanup Program Policy](#)

¹ <http://www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm>

² <https://fortress.wa.gov/ecy/publications/SummaryPages/ecy070219.html>

³ <https://apps.leg.wa.gov/RCW/default.aspx?cite=18.220>

⁴ <https://apps.leg.wa.gov/RCW/default.aspx?cite=18.43>

⁵ <https://ecology.wa.gov/eim>

[840](#)⁶ describes data submittal requirements. Please visit the [EIM Submit Data webpage](#) for data submittal instructions.

Payment

We will send monthly invoices to the billing contact listed in your VCP application form. Payment is due within 30 calendar days of the date of each invoice. Our invoices include a summary of costs incurred, payments received, names of staff billing to the project, and the time spent on the project during the previous month.

If you replace your billing contact, or their contact information changes, you must submit a completed [change of contact form](#).

Independent remedial action grants and cultural resource compliance review

You may qualify for an Independent Remedial Action Grant from Ecology after completing an independent cleanup and receiving a no further action opinion from us. We accept grant applications continuously. Visit our [Applying for or managing a grant or loan](#) webpage⁷ for information about this program and how to apply.

Under Governor's Executive Order 21-02, we may not fund ground-disturbing cleanup actions unless we, or another state or federal agency, consults with the [Washington Department of Archaeology and Historic Preservation](#)⁸ and affected Tribes, before the cleanup actions are performed. The consultation's purpose is to identify potential impacts on cultural resources.

Under the VCP, you may request that we perform the specified consultation by completing and submitting the [Cultural Resources Review Form](#).⁹ For more information about compliance with Washington's cultural resource laws, see our [Washington Cultural Resource Regulations: Summary for Independent Cleanup Sites](#).¹⁰

Contact Information

We are committed to working with you to reach the prompt and effective cleanup of your Site. If you have any questions, please contact me at ted.uecker@ecy.wa.gov, or call 509-342-5564.

⁶ <https://fortress.wa.gov/ecy/publications/SummaryPages/1609050.html>

⁷ <https://ecology.wa.gov/About-us/How-we-operate/Grants-loans#Apply>

⁸ <https://dahp.wa.gov/>

⁹ <https://apps.ecology.wa.gov/publications/documents/ecy070537.pdf>

¹⁰ <https://apps.ecology.wa.gov/publications/SummaryPages/1909059.html>


Kirk Klicker
August 26, 2025
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Sincerely,



Ted M. Uecker
VCP Coordinator
Toxics Cleanup Program, ERO

Enclosure: Copy of signed VCP Agreement

cc: Yancy Meyer, Blue Mountain Environmental and Consulting Company, Inc.
Nicholas Acklam, Ecology, TCP 
Art Jenkins, Ecology, WQ
Chad Sauve, Ecology, WQ
TCP Cost Recovery Coordinator, Ecology Fiscal Office (by email)

Enclosure

Copy of Signed Standard VCP Agreement



Voluntary Cleanup Program Agreement

Washington State Department of Ecology - Toxics Cleanup Program

For completion by Ecology only	Facility/Site Name:	Klicker Farm UST Release
	Facility/Site ID:	100004140
	VCP Project ID:	EA0402

Instructions

Submit this Agreement (original) to Ecology as part of your Application. Before submitting, enter the Customer’s name and the Site’s address on the first page, and sign the Agreement on the third page.

If your Application is accepted, then Ecology will do the following: 1) identify the Site and VCP project in the box below; 2) sign and date the Agreement; and 3) send you a copy of the completed Agreement.

This document constitutes an Agreement between the Washington State Department of Ecology (Ecology) and Kirk Klicker (Customer) to provide informal site-specific technical consultations under the Voluntary Cleanup Program (VCP) for the Site identified below and associated with the following address: 106 Strawberry Lane, Walla Walla, Washington 99362

The purpose of this Agreement is to facilitate independent remedial action at the Site. Ecology is entering into this Agreement under the authority of the Model Toxics Control Act (MTCA), chapter 70A.305 RCW, and its implementing regulations, chapter 173-340 WAC. If a term in this Agreement is defined in MTCA or chapter 173-340 WAC, then that definition shall govern.

Services provided by Ecology

Upon request, Ecology agrees to provide the Customer informal site-specific technical consultations on the independent remedial actions proposed for or performed at the Site consistent with WAC 173-340-515(5). Those consultations may include assistance in identifying applicable regulatory requirements and opinions on whether the remedial actions proposed for or conducted at the Site meet those requirements.

Ecology may use any appropriate resource to provide the Customer with the requested consultative services. Those resources may include, but shall not be limited to, those of Ecology and the Office of the Attorney General. However, Ecology shall not use independent contractors unless the Customer provides Ecology with prior written authorization.

In accordance with RCW 70A.305.170, any opinions provided by Ecology under this Agreement are advisory only and not binding on Ecology. Ecology, the state, and officers and employees of the state are immune from all liability. Furthermore, no cause of action of any nature may arise from any act or omission in providing, or failing to provide, informal advice and assistance under the VCP.

Payment for services by customer

The Customer agrees to pay all costs incurred by Ecology in providing the informal site-specific technical consultations requested by the Customer consistent with WAC 173-340-515(6) and 173-340-550(6). Those costs may include the costs incurred by attorneys or independent contractors used by Ecology to provide the requested consultative services. Ecology’s hourly costs shall be determined based on the method in WAC 173-340-550(2).

Voluntary Cleanup Program Agreement
Washington State Department of Ecology - Toxics Cleanup Program

Ecology shall mail the Customer a monthly itemized statement of costs (invoice) by the tenth day of each month (invoice date) that there is a balance on the account. The invoice shall include a summary of the costs incurred, payments received, identity of staff involved, and amount of time staff spent on the project.

The Customer shall pay the required amount by the due date, which shall be thirty (30) calendar days after the invoice date. If payment has not been received by the due date, then Ecology shall withhold any requested opinions and notify the Customer by certified mail that the debt is past due.

If payment has not been received within sixty (60) calendar days of the invoice date, then Ecology shall stop all work under the Agreement and may, as appropriate, assign the debt to a collection agency under chapter 19.16 RCW. The Customer agrees to pay the collection agency fee incurred by Ecology in the course of debt collection.

Reservation of rights / no settlement

This Agreement does not constitute a settlement of liability to the state under MTCA. This Agreement also does not protect a liable person from contribution claims by third parties for matters addressed by the Agreement. The state does not have the authority to settle with any person potentially liable under MTCA except in accordance with RCW 70A.305.040(4). Ecology's signature on this Agreement in no way constitutes a covenant not to sue or a compromise of any Ecology rights or authority.

Ecology reserves all rights under MTCA, including the right to require additional or different remedial actions at the Site should it deem such actions necessary to protect human health and the environment, and to issue orders requiring such remedial actions. Ecology also reserves all rights regarding the injury to, destruction of, or loss of natural resources resulting from the release or threatened release of hazardous substances at the Site.

Effective date, modifications, and severability

The effective date of this Agreement shall be the date on which this Agreement is signed by the Toxics Cleanup Program's Section Manager or delegated representative. This Agreement may be amended by mutual agreement of Ecology and the Customer. Amendments shall be in writing and shall be effective when signed and dated by the Toxics Cleanup Program's Section Manager or delegated representative. If any provision of this Agreement proves to be void, it shall in no way invalidate any other provision of this Agreement.

Termination of agreement

Either party may terminate this Agreement without cause by sending written notice by email or U.S. mail to the other party. The effective date of termination shall be the date Ecology sends notice to the Customer or the date Ecology receives notice from the Customer, whichever occurs first. Unless otherwise directed, issuance of a No Further Action opinion, either for the Site as a whole or for a portion of the real property located within the Site, shall constitute notice of termination by Ecology.

Under this Agreement, the Customer is responsible only for costs incurred by Ecology before the effective date of termination. However, termination of this Agreement shall not affect any right Ecology may have to recover its costs under MTCA or any other provision of law.

Representations and signatures

The undersigned representative of the Customer hereby certifies that he or she is fully authorized to enter into this Agreement and to execute and legally bind the Customer to comply with the Agreement.

Washington State Department of Ecology



*Digitally signed by Nick Acklam
Date: 2025.08.26 16:39:15 -07'00'*

Signature

Nicholas Acklam

Printed name
Section Manager, TCP

8/26/25

Date

Customer signatory



*Digitally signed by Kirk A Klicker
Date: 2025.08.25 08:48:22 -07'00'*

Signature

Kirk Klicker

Printed name of signatory

Property Owner

Title of signatory

8/20/25

Date

If you need this publication in an alternative format, please call the Toxics Cleanup Program at (360) 407-7170. Persons with hearing impairment can call 711 for Washington Relay Service. Persons with a speech disability may call (877) 833-6341.

Application for Standard & Expedited VCP Processes

Washington State Department of Ecology – Toxics Cleanup Program



Under the **Voluntary Cleanup Program**¹(VCP), Ecology offers free site-specific, technical consultations for independent remedial actions for both the Standard VCP process and the Expedited VCP process.

Applying to the Standard VCP Process

There is no fee to apply to the Standard VCP Process. Submit your application materials to the VCP Coordinator of the region where your site is located. Your application materials **must include this VCP application form, a VCP Agreement**² form, and a completed **Eligibility Form**.³

Then based on your site's county, email your completed application to the regional email address listed here:



Northwest Region⁴ – Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom

Southwest Region⁵ – Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum

Central Region⁶ – Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima

Eastern Region⁷ – Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman

Applying to the Expedited VCP Process

Unlike the Standard VCP Process, applying to the Expedited VCP Process requires a nonrefundable application fee. You **must pay that fee** within seven calendar days of receiving our invoice for the fee. After receiving your completed application, we will email our invoice to your project billing contact you list in **Part 1-C**. We won't process your application until we receive payment. Send your application to vcp-exp@ecy.wa.gov. Your complete Expedited VCP application must contain **all** the following:

1. **This VCP application form.**
2. **Expedited VCP Agreement**.⁸
3. **Completed Eligibility Form**.⁹
4. A remedial investigation report that meets our **remedial investigation checklist**¹⁰ requirements and is ready for our review. See the report requirements at **Working with the Voluntary Cleanup Program**.¹¹
5. Documentation of other remedial actions, investigations, or interim cleanup actions.
6. An automatically generated email as confirmation that all your site environmental data have been uploaded to our **Environmental Information Management**¹² (EIM) system.
7. A project cleanup schedule.

To send us large files, please use your preferred file transfer service to share files with vcp-exp@ecy.wa.gov or contact us for assistance on using our file transfer service.

To request an opinion on a planned or completed remedial action, you **must complete Part 2-C**.



Part 1 – Administration

1-A SITE INFORMATION

Enter site information as noted in Ecology’s **What’s in My Neighborhood**,¹³ or suggest a name (if a new site).

Full site name:

Ecology ERTS#, if any:

Street address or location:

1-B APPLICANT

The applicant is the person or organization applying to a VCP process. The applicant is responsible for paying Ecology’s incurred costs.

Applicant’s full name:

Identify the applicant’s entity type (check one). person organization

If the applicant is a **person** they **must** also be the project billing contact, as identified in both **Part 1-D** and **Part 1-E**. If the applicant is an **organization**, the project manager **must** be identified in **Part 1-B** and the project billing contact in **Part 1-D**. **Both** the project manager and the billing contact **must be direct employees** of the organization.

Identify the applicant’s involvement with the site (check all that apply).

<input type="checkbox"/> property owner	<input type="checkbox"/> property lessee	<input type="checkbox"/> consultant	<input type="checkbox"/> private person/organization
<input type="checkbox"/> past property owner	<input type="checkbox"/> business owner/operator	<input type="checkbox"/> attorney	<input type="checkbox"/> public agency/organization
<input type="checkbox"/> future property owner	<input type="checkbox"/> mortgage holder	<input type="checkbox"/> agent of property owner	<input type="checkbox"/> other-specify

The **Expedited VCP** applicant must have an ownership interest in the facility, or operate the facility, or have a contractual right to purchase, redevelop, or reuse the facility. Agents for the property owner, such as a consultant, may not apply to the Expedited VCP process.

Is the applicant authorized to grant us property access? yes no

1-C PROJECT MANAGER

We will send the project manager all official correspondence. The project manager **must** be either the applicant or employed by the applicant. The project manager may not be a hired independent contractor.

Project manager’s full name:

Title:

Organization:

Mailing address:

City:

State:

Zip:

Email address:

klickers4@gmail.com

Phone number:

1-D PROJECT BILLING CONTACT

We will send our monthly invoices to the project billing contact. The project billing contact **must** be either the applicant or employed by the applicant. The project billing contact may **not** be a hired independent contractor.

Billing contact’s full name:

Title:

Organization:

Mailing address:

City:

State:

Zip:

Email address:

Phone number:



1-E PROJECT CONSULTANT

If you have retained a consultant to conduct independent remedial action, but they aren't the applicant, enter the consultant's information here. Otherwise, skip to **Part 1-F**.

Project consultant's full name:

Title:

Organization:

Mailing address:

City:

State:

Zip:

Email address:

Phone number:

Do you want us to contact the project consultant? yes no

1-F PROPERTY OWNER

Check the property owner type (check one).

private tribal federal state county municipal public school mixed other-specify

If the applicant is the property owner, skip to **Part 2**. Otherwise, enter their information here.

Property owner's full name:

Title:

Organization:

Mailing address:

City:

State:

Zip:

Email address:

Phone number:

1-G STATE FUNDING (FOR LOCAL GOVERNMENTS ONLY)

State funding may be available to cover cleanup costs through an **Independent Remedial Action Grant (IRAG)**¹⁴ to help cover cleanup costs. If you qualify and plan to apply for such funding, Ecology requires a cultural resources review before any ground disturbance activities. Ecology leads this review in partnership with **Department of Archaeology and Historic Preservation**¹⁵ (DAHP) and potential affected Tribes.

Do you want Ecology to start a cultural resources review?

- yes To initiate a review, complete the **Cultural Resources Review Form**¹⁶ when applying to the VCP and submit it to tcpulturalresources@ecy.wa.gov. For more information, visit our **Cultural resource review**¹⁷ webpage.
- no By not requesting a cultural resources review now; you understand that any work conducted prior to a review will *not* be eligible for state funding. If you decide to apply for state funding at a later phase, only work conducted after the required review will be eligible.

Part 2 – Reporting requirements

When requested, we can provide written opinions on reports sent to us with this application. However, your reports first **must** meet our **Part 2-A** and **Part 2-B** reporting requirements.

2-A PROFESSIONAL LICENSING

Documents submitted containing geology, hydrogeology, or engineering geology interpretation or work must be stamped by of an appropriately licensed geologist, hydrogeologist, or engineering geologist, respectively, as required by chapter **18.220 RCW**.¹⁸

Documents submitted containing engineering work must be stamped by an appropriately licensed professional engineer, as required by chapter **18.43 RCW**.¹⁹



2-B SUBMIT ENVIRONMENTAL DATA TO ECOLOGY'S EIM SYSTEM

You must upload all site environmental sampling and analysis data to our EIM system and meet its **submittal requirements**.²⁰ Set up an account if you don't have one. **We won't issue** a no further action opinion unless you have satisfied these requirements.

2-C REQUEST A WRITTEN OPINION

After meeting the **Part 2-A** and **Part 2-B** reporting requirements, you can request a written opinion on reports we receive. If you want a written opinion now, list the reports below that you're sending for review. We'll base our opinion on your submitted reports and any site information in our database.

Are you requesting a written opinion at this time? yes no

List all reports you want reviewed for our opinion.

Part 3 – Describe your site

3-A SOURCE PROPERTY LOCATION

The "source property" is where contaminants were released into the environment, such as from an underground storage tank (UST) that leaked. Enter the source property location, if known.

Physical address:

Latitude:

Longitude:

List all parcel numbers of the source property:

3-B AFFECTED AND ADJACENT PROPERTIES

An "affected property" is one that is impacted by the contaminants released on a source property. Briefly describe whether and how any source property releases have impacted adjacent or other property. An example might include property affected by area-wide impacted from elevated lead and arsenic levels.

Describe releases to affected and/or adjacent property:

3-C RIGHTS OF WAY

Briefly describe if, and how, any of the releases have affected a right-of-way (e.g., roadway, sidewalk, easement).

Describe releases to any right-of-way:

3-D AREA WIDE SMELTER EMISSIONS

Is the site affected by area-wide **smelter emissions** (e.g., **Tacoma Smelter Plume area**²¹)? yes no unknown



3-E FORMER FRUIT ORCHARDS

Is the site in a former fruit orchard that operated before 1947? yes no unknown

3-F AFFECTED MEDIA

List known and suspected contaminants and the environmental media affected before cleanup actions.*

Contaminant	soil	groundwater	surface water/ sediment	indoor air
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*B = below cleanup level N = not suspected S = suspected C = above cleanup level O = confirmed not present U = unknown

Part 4 – Site operations

4-A CURRENT USE OF SOURCE PROPERTY

The facility on the source property is a (check all that apply):

waste treatment, storage, or disposal facility solid waste facility hazardous waste generator other-specify

4-B STORAGE TANK SYSTEM INFORMATION

Identify all aboveground storage tanks (ASTs)* and USTs that have ever stored chemicals on the source property.

List contaminant type. Leave blank where unknown.

Contaminant	UST/AST	Tank ID	Nominal size (gal)	Tank in use?	Install date	Closure date	Closure method	Releases?
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4-C REDEVELOPMENT PLANS AS PART OF CLEANUP

Will any source or affected properties, or portions of those properties be redeveloped as part of the cleanup?

yes no unknown

If “yes”, check all proposed land uses that apply.

residential school commercial industrial childcare facility agricultural park other-specify

Briefly describe activities proposed for the planned land use(s).



Part 5 – Independent remedial actions

5-A SCOPE OF REMEDIAL ACTIONS

Do you plan to **characterize and investigate** all site contamination, including contamination on affected adjacent properties, as part of your cleanup project? yes no unknown

If “no”, describe in your cleanup project work scope that you don’t plan to characterize or investigate all site contamination as part of a Standard VCP or Expedited VCP project. **Describe** the contamination on properties, portions of a property, environmental media affected, and contaminants to be cleanup up.

Briefly describe your cleanup project work scope.

5-B STATUS OF REMEDIAL ACTIONS (CHECK ALL THAT APPLY)

	Planned	Ongoing	Completed	Not applicable
Remedial action				
Initial response (UST only)				
Interim action				
Remedial investigation				
Feasibility study				
Cleanup action				

5-C INDEPENDENT REMEDIAL ACTION DOCUMENTATION

Title	Preparer	Document date	Sent to Ecology?	Date sent
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Part 6 – Affirmation and signature

The undersigned affirms that the information provided in this application is true and accurate to the best of the applicant's knowledge. Someone other than the applicant may sign this application form.

Name: Kirk Klicker

Title: Property Owner

Organization: _____

Mailing address: 106 Strawberry Lane

City: Walla Walla

State: WA

Zip: 99362

Email address: klickers4@gmail.com

Phone number: 509-629-3737

Signature: Kirk Klicker

Date: 8/25/20

Identify the signatory's involvement at the site (check all that apply).

applicant consultant property owner attorney other-specify _____

Expedited VCP note: While anyone may sign the application form, only certain types of applicants are eligible to join the Expedited VCP process and sign the Expedited VCP agreement. To sign the agreement, the applicant must have an ownership interest in the facility, or operate the facility, or have a contractual right to purchase, redevelop, or reuse the facility. If the applicant is a corporation, a representative authorized to bind the corporation must sign the Expedited VCP agreement.

Ecology commits to providing people with disabilities access to information and services by meeting or exceeding requirements of the Americans with Disabilities Act, Sections 504 and 508 of the Rehabilitation Act, and Washington State Policy #188. To request an Americans with Disabilities Act accommodation, contact Ecology at (360) 407-6831 or ecyadacoordinator@ecy.wa.gov. For Washington Relay Service or teletypewriter (TTY), call 711 or (877) 833-6341. Visit Ecology's accessibility & equity webpage.²²

¹ <https://www.ecy.wa.gov/vcp>

² <https://apps.ecology.wa.gov/publications/SummaryPages/ecy070324.html>

³ <https://apps.ecology.wa.gov/publications/SummaryPages/ECY070689.html>

⁴ <mailto:VCP-NWRO@ecy.wa.gov>

⁵ <mailto:VCP-SWRO@ecy.wa.gov>

⁶ <mailto:VCP-CRO@ecy.wa.gov>

⁷ <mailto:VCP-ERO@ecy.wa.gov>

⁸ <http://ecyapfpass/Biblio2/SummaryPages/ECY070633.html>

⁹ <https://apps.ecology.wa.gov/publications/SummaryPages/ECY070689.html>

¹⁰ <https://apps.ecology.wa.gov/publications/SummaryPages/1609006.html>

¹¹ <https://ecology.wa.gov/spills-cleanup/contamination-cleanup/voluntary-cleanup-program/working-with-vcp>

¹² <https://ecology.wa.gov/Research-Data/Data-resources/Environmental-Information-Management-database/EIM-submit-data>

¹³ <https://apps.ecology.wa.gov/neighborhood/?lat=47.500000&lon=-121.000000&zoom=7&radius=false>

¹⁴ <https://ecology.wa.gov/About-us/Payments-contracts-grants/Grants-loans/Find-a-grant-or-loan/Independent-remedial-action-grants>

¹⁵ <https://dahp.wa.gov/>

¹⁶ <https://apps.ecology.wa.gov/publications/documents/ecy070537.pdf>

¹⁷ <https://ecology.wa.gov/About-us/Payments-contracts-grants/Grants-loans/Find-a-grant-or-loan/Area-wide-groundwater-investigation-grants/Cultural-resources-review>

¹⁸ <https://app.leg.wa.gov/RCW/default.aspx?cite=18.220&full=true>

¹⁹ <https://app.leg.wa.gov/RCW/default.aspx?cite=18.43&full=true>

²⁰ <https://apps.ecology.wa.gov/eim/help/HelpDocuments/OpenDocument/14>

²¹ <https://apps.ecology.wa.gov/dirtalert/>

²² <https://ecology.wa.gov/about-us/accessibility-equity>