

BEFORE THE WASHINGTON STATE TRANSPORTATION COMMISSION

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IN RE: STATE ROUTE 2 )  
DAY-MT. SPOKANE ROAD TO )  
CHATTAROY )  
MP 298.48 TO MP 306.20 ) FINDINGS AND ORDER  
COMBINED HEARING ON DESIGN )  
AND LIMITED ACCESS )

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The hearing on the above entitled matter was held upon due notice to interested parties, beginning at 7 p.m., Thursday, June 11, 1987, in the Colbert Elementary School Gymnasium, Spokane, Washington, before John McRae, Hearing Examiner.

The interested persons and organizations were represented as follows:

DEPARTMENT OF TRANSPORTATION, by John Hurley, Assistant Attorney General, Temple of Justice, Olympia, Washington 98054;

SPOKANE COUNTY, by Ronald C. Hormann, P.E., Acting County Engineer, North 811 Jefferson Street, Spokane, Washington 99260;

B. J. CARNEY, by self, Route 3, Box 59, Mead, Washington 99021;

BACCHUS DEVELOPMENT CORP., by Joseph B. Haley, Vice President, Route 1, Box 254, Loon Lake, Washington 99148;

BURLINGTON NORTHERN RAILROAD, by L. H. Bahls, Division Engineer, West 221 First Street, Spokane, Washington 99204;

BURLINGTON NORTHERN RAILROAD, by Walter D. Farrell, Glacier Park Company, Suite 210, Hutton Building, South Ninth, Washington Street, Spokane, Washington 99204;

GERALD AND NONA CHALLINOR, by selves, 844 North Wood Avenue, Libby, Montana 59923;

CHARLES M. CROFOOT, GENERAL CONTRACTOR, by self, 10015 Creek Road, Oakview, California 93022;

JEFFREY L. DAILING, by self, North 16623 Newport Highway, Mead, Washington 99021;

HELEN HOLMAN, by Robert A. Holman, Route 3, Box 66, Mead, Washington 99021;

ROBERT A. HOLMAN, by self, Route 3, Box 66, Mead, Washington 99021;

MAE JAMES, by self, North 6603 Atlantic, Spokane, Washington 99208;

HOWARD JOHNSON, by self, Box 121, Chattaroy, Washington 99003;

FRANK J. KAPEL, by self, P.O. Box 64, Colbert, Washington 99005;

ALFRED AND JANETTE KUMMER, by selves, Box 61, Chattaroy, Washington 99003;

FRANK AND DONNA LEHMAN, by selves, Route 2, Box 35, Chattaroy, Washington 99003;

MICHAEL M. MC GARVEY, by self, West 514 Park Place, Spokane, Washington 99205;

CHARLES I. NYBERG, by self, Route 3, Box 67, Mead, Washington 99021;

(ROGERS) FAITH CHRISTIAN SCHOOL, by Anita Utley, Corporate Officer, Route 3, Box 33, Mead, Washington 99021;

KENNETH R. TRIMBORN, by self, North 9010 Wall, Spokane, Washington 99218;

JIM WILSON, by self, North 18805 Newport Highway, Colbert, Washington 99005;

MARY FRANCES ZALIK, by self, North 28022 Cottonwood Road, Chattaroy, Washington 99003;

L. STANLEY ZALIK, by self, North 28022 Cottonwood Road, Chattaroy, Washington 99003.

As a courtesy to interested citizens, the Commission furnishes a copy of the Findings and Order to all persons filing a Notice of Appearance, even though some may not properly be

parties to the hearing. For administrative convenience, all persons filing a Notice of Appearance are listed above. The Commission, by including a person in this listing and by furnishing a copy of the Findings and Order, does not acknowledge or necessarily recognize the recipient to be a proper party to the hearing.

The meeting was called to order by Don Trantum, District Administrator, after which witnesses were called. Evidence was taken by a Court Reporter and thereafter transcribed. Certain exhibits were duly introduced as evidence. The undersigned members of the Transportation Commission have personally considered the transcript of the hearing. Based upon the oral evidence and the exhibits introduced in evidence, the Transportation Commission of the state of Washington makes the following findings:

#### I

Prior to March 24, 1955, a plan for the establishment of a limited access highway over a portion of State Route 2 in Spokane County, Washington, was ordered under Commission Resolution No. 236, and its amendments thereto.

Such a plan was prepared and entitled "SR 2, DAY-MT. SPOKANE ROAD TO CHATTAROY, MP 298.48 TO 306.20," sheets 1 through 18 of 18 sheets. These sheets were introduced into evidence marked as Exhibit No. 7-1 through 7-18, which were made part of the hearing record.

#### II

The Department of Transportation received from the public agencies concerned with the proposed plan their available data on planning, land use, local traffic, and such other information required, and thereafter prepared and submitted to the

appropriate officials an Access Report showing how those factors have been taken into account and covering other matters required by RCW 47.52.131, et seq. A copy of that report was introduced into evidence marked Exhibit No. 4.

By letter dated April 28, 1987, Ronald C. Hormann, P.E., Acting Spokane County Engineer, concurred with the plan and Access Report, and said letter was introduced into evidence marked Exhibit No. 5.

### III

On May 8, 1987, the Project Development Engineer by Order proposed said plan and set a hearing date in accordance with the provisions of RCW 47.52.131, et seq. The Order of Hearing was introduced into evidence marked as Exhibit No. 1.

### IV

Lue Clarkson, Administrator, Washington State Transportation Commission, issued a Notice of Hearing. On May 22, 1987, an exact copy of this notice was mailed to Spokane County, various agencies and other interested parties, and to each of those record owners of property listed on the County Tax Roll, as depicted in the Affidavit of Service by Mailing introduced into evidence marked Exhibit No. 3. An exact copy of the notice was published in the Spokesman Review/Spokane Chronicle on May 11, 1987, as shown by the Affidavit of Publication of Juanita Thurston, and May 26, 1987, as shown by Juanita Thurston, Principal Clerk of said newspaper, which affidavits were introduced into evidence marked Exhibit Nos. 2-1 and 2-2.

### V

The plan proposes the establishment of a limited access facility with partial access control for SR 2 from Day-Mt.

Spokane Road to Chattaroy between Station LL 9+99.89 and Station LL 416+14.82, as shown on sheets 1 through 18 of 18 sheets entitled "SR 2, DAY-MT. SPOKANE ROAD TO CHATTAROY, SPOKANE COUNTY."

## VI

This section of State Route 2 is an important part of the highway system of the state of Washington and represents a substantial expenditure in construction costs. It is functionally classified as a Principal Arterial, and Commission Policy provides for access control on highways of this type. In doing so, the investment of public funds is protected by preserving the highway for future use.

The efficiency of the highway as a means of moving a maximum volume of traffic in safety is directly related to the number of access points. It has been demonstrated in the past that, as property owners establish approaches to the highway for their personal use or for business enterprise, the problem becomes increasingly great and the road gradually becomes obsolete. Therefore, access points should be kept to a minimum consistent with allowing local traffic adequate use of the facility at properly designed interchanges, intersections, and approaches.

The plan for the establishment of a limited access highway facility with partial access control on State Route 2 in Spokane County, introduced into evidence marked Exhibit Nos. 7-1 through 7-18, will facilitate travel, reduce accident rates, preserve the public investment, and sustain the highway as a modern transportation facility.

## VII

In addition to the exhibits previously mentioned, the following exhibits were entered into evidence at or subsequent to the hearing and made a part of the hearing record:

- Exhibit No. 6 Mitigated SEPA checklist along with the Declaration of Non-Significance dated December 12, 1986.
- Exhibit No. 8 Typical roadway section for the existing and proposed highways.
- Exhibit No. 9 Comment sheet not dated from Jim Wilson concerning approach width onto his property.
- Exhibit No. 10 Reserved Exhibit to reply to Exhibit No. 9.
- Exhibit No. 11 Comment sheet not dated from Robert G. Johnson concerning impact of the frontage road onto his property and access of swimmers to the Little Spokane River.
- Exhibit No. 12 Reserved Exhibit to reply to Exhibit No. 11.
- Exhibit No. 13 Letter not dated from Walter D. Farrell, representing Glacier Park Company, concerning access from their property west of SR 2 between Elk-Chattaroy Road and Jim Hill Road. Also a request for a "full access road."
- Exhibit No. 14 Reserved Exhibit to reply to Exhibit No. 13.
- Exhibit No. 15 Comment sheet not dated from Alfred and Janette Kummer concerning septic tank and drain field for the Chattaroy Store and access to "Main Street."

- Exhibit No. 16            Reserved Exhibit to reply to Exhibit No. 15.
- Exhibit No. 17            Comment sheet not dated from Charles I. Nyberg concerning divided highway design and frontage roads.
- Exhibit No. 18            Reserved Exhibit to reply to Exhibit No. 17.
- Exhibit No. 19            Proposals not dated from Charles I. Nyberg concerning three alternate designs to the FR 1 frontage road.
- Exhibit No. 20            Reserved Exhibit to reply to Exhibit Nos. 19, 21, 29, and 39.
- Exhibit No. 21            Proposals not dated from Charles I. Nyberg, Clarence W. Bartholomew, Wm. A. Medin, Robert Holman, Jeffrey Dailing, concerning three alternate designs to the FR 1 frontage road.
- Exhibit No. 22            Reserved Exhibit to reply to Exhibit No. 21.
- Exhibit No. 23            Comment sheet not dated from A. Utley concerning access and project impacts on the school property.
- Exhibit No. 24            Reserved Exhibit to reply to Exhibit No. 23.
- Exhibit No. 25            Comment sheet not dated from Mary Frances Zalik concerning project impacts and amount of land to be purchased from her.

Exhibit No. 26            Reserved Exhibit to reply to Exhibit  
No. 25.

Exhibit No. 27            Comment sheet not dated from L. Stanley  
Zalik concerning project impacts and  
amount of land to be purchased from him.

Exhibit No. 28            Reserved Exhibit to reply to Exhibit  
No. 27.

Exhibit No. 29            Plan sheet dated June 11, 1986, from  
Clarence W. Bartholomew concerning  
alternate access for the frontage road  
(FR 1) south of Greenbluff Road.

Exhibit No. 30            Reserved Exhibit to reply to Exhibit  
No. 29.

Exhibit No. 31            Comment sheet not dated from Dale and  
Annette Url concerning project impact on  
their property and zoning.

Exhibit No. 32            Reserved Exhibit to reply to Exhibit  
No. 31.

Exhibit No. 33            Comment sheet not dated from Donald H.  
Bartlett concerning crossing SR 2 at  
certain county road intersections.

Exhibit No. 34            Reserved Exhibit to reply to Exhibit  
No. 33.

Exhibit No. 35            Letter not dated from Joseph B. Haley,  
representing Bacchus Development,  
concerning pavement of frontage roads.

- Exhibit No. 36            Reserved Exhibit to reply to Exhibit No. 35.
- Exhibit No. 37            Letter not dated from Michael M. McGarvey concerning location of his approach on the hearing plans.
- Exhibit No. 38            Reserved Exhibit to reply to Exhibit No. 37.
- Exhibit No. 39            Plan sheet dated June 22, 1987, from Clarence W. Bartholomew concerning alternate access to his property.
- Exhibit No. 40            Reserved Exhibit to reply to Exhibit No. 39.
- Exhibit No. 41            Comment sheet dated June 25, 1987, from Kenneth R. Trimborn concerning location of his approach to Colbert Road.
- Exhibit No. 42            Reserved Exhibit to reply to Exhibit No. 41.
- Exhibit No. 43            Reserved Exhibit.

#### VIII

The Commission has considered evidence on the entire portion of the above entitled highway and finds the plan introduced into evidence marked Exhibit No. 7-1 through 7-18 should be modified as hereinafter set forth and shown on Exhibit "A" attached.

1. Revise plan sheet 4 of 18 sheets to redesignate the Type A approach between Station LL 10+00 and Station

LL 11+20 Lt., to a Type B approach for Parcel No. 6-02774 as recommended by the Department at the hearing on page 40 of the hearing transcript.

2. Revise plan sheets 4 and 5 of 18 sheets to relocate the right of way and limited access line between Station LL 27+00.66 and Station LL 39+63.17 Rt. as requested by Dale Url in Exhibit No. 31 and recommended by the Department in Reserved Exhibit No. 32.
3. Revise plan sheets 4 and 5 of 18 sheets to delete the FR 1 Line between Station FR 1 10+00.00 and Station FR 1 28+42.49; relocate the right of way and limited access line from Station LL 34+75 to Station LL 39+63.38 Rt.; and to add a joint use Type B approach at Station LL 26+62 Lt. for Parcel Nos. 6-02777, 6-02778, 6-02779, 6-02780, and 6-02782; and to provide a 30-foot access easement across Parcel Nos. 6-02779 and 6-02778 for transfer to Parcel No. 6-02777; and provide a 30-foot access easement across Parcel No. 6-02780 for transfer to Parcel No. 6-02782, as requested by Charles Nyberg in Exhibit Nos. 17 and 19, Clarence Bartholomew, W. Medin, Robert Holman, and Jeff Dailing in Exhibit Nos. 21, 29, and 39, and by Robert Holman on pages 67 through 70 of the hearing transcript and recommended by the Department in Reserved Exhibit Nos. 20, 22, 30, and 40.
4. Revise plan sheet 6 of 18 sheets to redesignate the Type A approach for Parcel No. 6-02795 between Station LL 64+70 and Station LL 66+25 Lt. to a Type B approach and relocate that approach to Station LL 66+25 Lt. and to add Parcel No. 6-02796 as a joint user to the approach at Station LL 66+25 Lt. This plan revision was recommended by the Department at the hearing on page 45 of the hearing transcript.

5. Revise plan sheet 6 of 18 sheets to redesignate the Type A approach for Parcel No. 6-02797 to a Type B as recommended by the Department at the hearing on page 46 of the hearing transcript.
6. Revise plan sheet 6 of 18 sheets to add a Type B approach between Station CR 22+50 and Station CR 23+84 Rt. for Parcel No. 6-02799 as requested by Kenneth Trimborn in Exhibit No. 41 and recommended by the Department at the hearing on page 46 of the hearing transcript and in Reserved Exhibit No. 42.
7. Revise plan sheet 7 of 18 sheets to redesignate the Type A approach between Station LL 98+00 and Station LL 101+70 Lt. to a Type B and relocate that approach to Station LL 101+70 Lt. for Parcel No. 6-02803, and to add Parcel No. 6-02804 as joint user to the approach at Station LL 101+70 Lt. as requested by Jim Wilson in Exhibit No. 9 and recommended by the Department on pages 47 and 48 of the hearing transcript and in Reserved Exhibit No. 10.
8. Revise plan sheet 8 of 18 sheets to add a Type C approach between Station W 12+50 and Station W 13+84 Rt. for Parcel No. 6-02815 as recommended by the Department at the hearing on page 48 of the hearing transcript.
9. Revise plan sheet 13 of 18 sheets to add a Type B approach at Station LL 270+53 Lt. and to add a Future Grade Intersection at Station LL 270+53.38 Lt. At the time the grade intersection is constructed, the Type B approach will be deleted. This revision was requested by Mike McGarvey in Exhibit No. 37, Walter Farrell in Exhibit No. 13, and requested by Jim Gillogly at the hearing on pages 65 to 67 of the transcript and at a

meeting with the Department staff on June 24, 1987, and is recommended by the Department in Reserved Exhibit Nos. 14, 38, and 43.

10. Revise plan sheet 13 of 18 sheets to extend the JH Line further south from Station LL 286+82.96 to Station LL 270+53.38 Rt. and delete the grade intersection at Station LL 285+71.68 Rt. in response to a request made by Walter Farrell in Exhibit No. 13 and recommended by the Department in Exhibit No. 14.
11. Revise plan sheet 15 of 18 sheets to redesignate the Type A approach at Station CH 8+20 Lt. to a Type B approach for Parcel No. 6-02827 as recommended by the Department at the hearing on page 54 of the hearing transcript.
12. Revise plan sheet 15 of 18 sheets to add a Type B approach at Station CH 7+90 Lt. for Parcel No. 6-02828 as recommended by the Department at the hearing on page 54 of the hearing transcript.
13. Revise plan sheet 17 of 18 sheets to remove the limited access line from Station DR 7+70 to Station DR 7+00 Parcel Nos. 6-02847, 6-02848, and 6-02850 and to delete the Type D approach for Parcel No. 6-02850 as recommended by the Department at the hearing on pages 58 and 59 of the hearing transcript.
14. Revise plan sheet 1 through 18 of 18 sheets to make minor plan revisions to correct ownerships and parcel details, area computations, and right of way details.

IX

The Commission also considered the following requests and makes the following findings:

1. Ms. Anita Utley at the hearing and in Exhibit No. 23 requested a chain link fence be constructed on Parcel No. 6-02790 instead of the proposed wire fence and commented that no access is provided for the new buildings to the north of their existing buildings.

The Department in Reserved Exhibit No. 24 indicates that access to the north buildings will be from the cul-de-sac at the north end of the FR 2 line. Construction of a driveway from the cul-de-sac to the northern buildings and chain link fencing will be handled at the time of right of way negotiations.

2. Mr. Robert Johnson in Exhibit No. 11 was concerned about the impacts of relocating his access from SR 2 and vehicles parking in his driveway blocking his access.

As stated by the Department in Reserved Exhibit No. 12, the implementation of partial access control should greatly reduce the use of this area and therefore eliminate the parking problem. The issue of impacts relating to relocation of Mr. Johnson's access can be dealt with at the time right of way negotiations are made.

3. Mr. and Mrs. Alfred Kummer in Exhibit No. 15 expressed concern about relocating the drain field and septic tank on Lots 4 and 5 of Parcel No. 6-02833.

The relocation of the drain field and septic tank will be handled at the time right of way negotiations are made.

4. Mr. Charles Nyberg in Exhibit Nos. 17 and 19 suggested that the divided highway start north of Colbert.

The Department in Reserved Exhibit Nos. 18 and 20 has determined it to be in the public's best interest of safety, highway capacity, and future growth to transition the highway north of Day-Mt. Spokane Road to a divided highway. Day-Mt. Spokane Road was selected because land use transitions from urban development to rural usage at that point.

5. Mr. Haley in Exhibit No. 35 requested asphalt concrete pavement (ACP) be used on frontage roads instead of bituminous surface treatment (BST).

As indicated in Reserved Exhibit No. 36, the Department's policy is to use ACP on roadways with an average daily traffic (ADT) of 2,000 or more per day. Frontage roads on this project are way below the 2,000 ADT level necessary to use ACP pavement.

6. Mr. Kenneth Trimborn, Parcel No. 6-0299, in Exhibit No. 41 requested the right of way fence be angled back 25 feet at his approach to provide an area for a car to stop so that a gate could be opened.

As indicated in Reserved Exhibit No. 42, the issue of a fence set back will be addressed at the time of right of way negotiations.

7. Mr. and Mrs. Zalik, Parcel No. 6-02859, in Exhibit Nos. 25 and 26 objected to a portion of their property and the placement of any object along their frontage.

The Department in Reserved Exhibit Nos. 26 and 28 stated that the purchase of right of way is necessary to maintain a uniform and manageable right of way.

It has not been determined yet if any structure will be located on the right of way next to this property. It is possible that a highway sign or light pole could be located within this area.

X

The Commission particularly finds in the case of each abutting ownership that the adoption of the plan making said highway a limited access facility, said plan being attached hereto and Marked Exhibit "A," is required for public convenience and necessity.

Based upon the foregoing findings and evidence supporting them, the Transportation Commission of the State of Washington,  
ORDERS:

I

That the section of State Route 2 in Spokane County described as follows is hereby designated as a limited access highway of the partial access control type:

Between Sta. LL 9+99.89 and Sta. LL 416+14.82 as shown on sheets 1 through 18 of 18 sheets entitled, "SR 2, DAY-MT. SPOKANE ROAD TO CHATTAROY, MP 298.48 to MP 306.20, SPOKANE COUNTY," dated May 1, 1987.

II

That the plan set forth in Exhibits 7-1 through 7-18 for the establishment of access control of said highway be revised as follows, and as shown on Exhibit "A" hereto attached and by this reference made a part hereof:

1. Revise plan sheet 4 of 18, Parcel No. 6-02774, to redesignate the Type A approach between Station LL 10+00 Lt. and Station LL 11+20 Lt. to a Type B approach.
2. Revise plan sheets 4 and 5 of 18 sheets to relocate the right of way and limited access line between Station LL 27+00.66 and Station LL 39+63.17 Rt.
3. Revise plan sheets 4 and 5 of 18 sheets to delete the FR 1 Line between Station FR 1 10+00.00 and Station FR 1 28+42.49; relocate the right of way and limited access line from Station LL 34+75 to Station LL 39+63.38 Rt.; and to add a joint use Type B approach at Station LL 26+62 Lt. for Parcel Nos. 6-02777, 6-02778, 6-02779, 6-02780, and 6-02782; and to add a 30-foot access easement across Parcel Nos. 6-02779 and 6-02778 for transfer to Parcel No. 6-02777; and to provide a 30-foot access easement across Parcel No. 6-02780 for transfer to Parcel No. 6-02782.
4. Revise plan sheet 6 of 18 sheets to redesignate the Type A approach for Parcel No. 6-02795 to a Type B approach; and

relocate that approach from between Station LL 64+70 and Station LL 66+25 Lt. to Station LL 66+25 Lt., and to add Parcel No. 6-02796 as a joint user to the approach at Station LL 66+25 Lt.

5. Revise plan sheet 6 of 18, Parcel No. 6-02797 to redesignate the Type A approach between Station LL 67+70 to LL 69+60 Rt., to a Type B approach.
6. Revise plan sheet 6 of 18, Parcel No. 6-02799 to add a Type B approach between Station CR 22+50 and Station CR 23+84 Rt.
7. Revise plan sheet 7 of 18 sheets to redesignate the Type A approach between Station LL 98+00 and Station LL 101+70 Lt. to a Type B and relocate that approach to Station LL 101+70 Lt. for Parcel No. 6-02803; and to add Parcel No. 6-02804 as a joint user to the approach at Station LL 101+70 Lt.
8. Revise plan sheet 8 of 18 sheets to add a Type C approach between Station W 12+50 and Station W 13+84 Rt. for Parcel No. 6-02815.
9. Revise plan sheet 13 of 18 sheets to add a Type B approach at Station LL 270+53 Lt., and to add a Future Grade Intersection at Station LL 270+53.38 Lt.
10. Revise plan sheet 13 of 18 sheets to extend the JH Line further south from Station LL 286+82.96 to Station LL 270+53.38 Rt. and delete the grade intersection at Station LL 285+71.68 Rt.

11. Revise plan sheet 15 of 18 sheets to redesignate the Type A approach at Station CH 8+20 Lt. to a Type B approach for Parcel No. 6-02827.
12. Revise plan sheet 15 of 18 sheets to add a Type B approach at Station CH 7+90 Lt. for Parcel No. 6-02828.
13. Revise plan sheet 17 of 18 sheets to remove the limited access line from Station DR 7+70 to Station DR 7+00 Parcel Nos. 6-02847, 6-02848, and 6-02850; and to delete the Type D approach for Parcel No. 6-02850.
14. Revise plan sheet 1 through 18 of 18 sheets to make minor plan revisions to correct ownerships and parcel details, area computations, and right of way details.

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III

That the plan entitled, "SR 2, DAY-MT. SPOKANE ROAD TO CHATTAROY, MP 298.48 TO MP 306.20, SPOKANE COUNTY," sheets 1 through 18 of 18 sheets, dated May 1, 1987, as revised above and as shown in Exhibit "A," and be the same is hereby adopted.

That the following plans are hereby superseded:

"SR 2, DEAN TO CHATTAROY PLAN SHOWING ACCESS," Spokane County, sheets 1 through 7 of 7 sheets, approved October 11, 1955.

"PRIMARY STATE HIGHWAY NO. 6, HILLYARD JUNCTION TO DEAN," Right of Way, Spokane County, sheets 3 through 5 sheets, approved January 28, 1952.

"PRIMARY STATE HIGHWAY NO. 6, DEAN VICINITY,"  
Right of Way, Spokane County, sheets 2 of 15  
sheets approved September 14, 1940.

"SR 2, DEAN TO CHATTAROY," Right of Way, Spokane  
County, sheets 1 through 11 of 11 sheets, approved  
April 3, 1956.

"SR 2, BEAR CREEK REVISION," Right of Way, Spokane  
County, sheet 4 (part.) of 5, approved September  
15, 1932.

ADOPTED this 19<sup>th</sup> day of May, 1988.

WASHINGTON STATE TRANSPORTATION COMMISSION

Leo B. Sweeney  
LEO B. SWEENEY, Chairman

William J. Ramps  
WILLIAM J. RAMPS, Vice Chairman

Vaughn Hubbard  
VAUGHN HUBBARD, Member

Bernice Stern  
BERNICE STERN, Member

Richard Odabashian  
RICHARD ODABASHIAN, Member

Albert D. Rosellini  
ALBERT D. ROSELLINI, Member

James Henning  
JIM HENNING, Member

ATTEST:

Luc Clarkson  
LUC CLARKSON, Administrator

APPROVED AS TO FORM:

Therese C. Jones  
Assistant Attorney General