

BEFORE THE WASHINGTON STATE TRANSPORTATION COMMISSION

IN RE: STATE ROUTE 20)	
WEEMAN BRIDGE TO WINTHROP)	
MP 185.56 to MP 192.37)	FINDINGS AND ORDER
COMBINED HEARING ON DESIGN AND)	
LIMITED ACCESS)	

The hearing on the above entitled matter was held, upon due notice to interested parties, beginning at 7:00 p.m., Thursday, March 24, 1988, in the Liberty Bell High School Cafeteria, in Winthrop, Washington, before John McRae, Hearing Examiner.

Interested parties and organizations were represented as follows:

DEPARTMENT OF TRANSPORTATION, by Ted Torve, Assistant Attorney General, Temple of Justice, Olympia, Washington 98504;

WARREN BADGER, Mayor, Town of Winthrop, Box 545, Winthrop, Washington;

JACKIE BOVEE, by self, Box 431, Twisp, Washington;

TED BOLIN, by self, Star Route Box 7, Winthrop, Washington;

PAUL E. CHRISTEN, NC Hiway Association, P.O. Box 727, Winthrop, Washington;

ANNA COTNER, by self, P.O. Box 178, Winthrop, Washington;

DON AND MARILYN DAGNAN, by selves, P.O. Box 788, Winthrop, Washington;

BETSY DEVIN, by self, Star Route, Winthrop, Washington;

STEVE DEVIN, by self, Star Route, Winthrop, Washington;

L. C. DICUS, by self, Box 671, Twisp, Washington;

HAROLD H. HEATH, by self, Star Route, Box 12, Winthrop, Washington;

STEVEN A. HYZER, by self, P.O. Box 304, Twisp, Washington;

WALT HOLCOMB, by self, Star Route, Box 20, Winthrop, Washington;

JERRY B. KING, Department of Wildlife, Star Route 68, Box 896, Okanogan, Washington 98840;

JIM KING, King Associates, P.O. Box 249, Winthrop, Washington;

ROY AND DORIS KUMM, by selves, Route 1, Box 400-2, Winthrop, Washington;

MACK AND JEAN LLOYD, Lloyd Logging, Route 1, Box 306, Winthrop, Washington;

DAVID MC COMB, by self, P.O. Box 163, Winthrop, Washington;

LEANNA MELTON, by self, Route 1, Box 17, Winthrop, Washington;

JOSEPH H. NOTT, Okanogan County Public Works Department, P.O. Box 232, Okanogan, Washington;

JIM PARRISH, Winthrop Council, Box 516, Winthrop, Washington;

WARREN PRINGLE, Okanogan County Electric Co-Op, Box 69, Winthrop, Washington;

RICHARD C. ROBERTS, Mazama Advisory Committee, Star Route, Box 36, Mazama, Washington;

D. LARRY WRIGHT, Okanogan County Planning, Okanogan, Washington.

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 included in the listing 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 David B. House, District Project Development Engineer, 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

SR 20 was designated a limited access highway from the vicinity of Rockport in Skagit County to Twisp in Okanogan County by Highway Commission Resolution No. 2382 on June 22, 1971. It is proposed to implement modified access control from the section of SR 20 located within the limits of this project. This section of the route is classified as a Minor Arterial Highway under Washington State Department of Transportation standards.

Such a plan was prepared and entitled "SR 20, WEEMAN BRIDGE TO WINTHROP, MP 185.56 to MP 192.37, OKANOGAN COUNTY," sheets 1 through 15 of 15 sheets, dated February 5, 1988. These sheets were introduced into evidence marked as Exhibit No. 7a to 7o, which were made a part of the hearing record.

II

The Department 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 local 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 Access Report was introduced into evidence marked Exhibit No. 5.

By letter dated March 22, 1988, the Okanogan County Commissioners gave their concurrence to the plan and the Access Report and said letter was introduced into evidence marked Exhibit No. 10.

III

On February 5, 1988, the Project Development Engineer, by Order, proposed said plans and set a hearing date in accordance with the provisions of RCW 47.52.131, et seq. Said Order was introduced into evidence marked as Exhibit No. 1.

IV

Lue Clarkson, Administrator, Washington State Transportation Commission, issued a Notice of Limited Access Hearing. On March 1, 1988, an exact copy of this notice was mailed to Okanogan County, various agencies and other interested parties, and to each of those record owners of property listed on the County Tax Rolls, as depicted in the Affidavit of Service by Mailing introduced into evidence marked Exhibit No. 3a. An exact copy of the notice was published in The Wenatchee World on February 25 and March 10, 1988, as shown by the Affidavit of Publication of Georgia E. Valdez, Legal Clerk of said newspaper, which affidavit was introduced into evidence marked Exhibit No. 2a. An exact copy of the notice was published in the Omak-Okanogan County Chronicle on March 2 and March 16, 1988, as shown by the Affidavit of Publication of Elizabeth B. Widel, Principal Clerk of said newspaper, which affidavit was introduced into evidence marked Exhibit No. 2b. An exact copy of the notice was published in Methow Valley News on February 25 and March 10, 1988, as shown by the Affidavit of Publication of Richard Grehan, Editor and Business Manager of said newspaper, which affidavit was introduced into evidence marked Exhibit No. 2c.

V

The plan proposes the establishment of a modified controlled limited access facility for the following described section of State Route 20:

Between Sta. 409+47.89 and Sta. 769+00 as shown on sheets 1 through 15 of 15 sheets entitled "SR 20, WEEMAN BRIDGE VICINITY TO WINTHROP, MP 185.56 TO MP 192.37, OKANOGAN COUNTIES," dated February 5, 1988.

VI

This section of State Route 20 is an important part of the highway system for the northerly part of the state of Washington. It is functionally classified as a Minor Arterial, and the Department policy provides for modified access control on highways of this type. In establishing access control, 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 modified controlled limited access highway facility on State Route 20 in Okanogan County, introduced into evidence marked Exhibit Nos. 7a through 7o, 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. 3b Cover letter for announcing the hearing times and locations.
- Exhibit No. 3c Mailing list of property owners and other concerned agencies and citizens that received the Notice of Hearing.
- Exhibit No. 4 Draft Environmental Impact Statement entitled SR 20, Weeman Bridge to Winthrop.
- Exhibit No. 6 Preliminary Design Report entitled SR 20, Weeman Bridge to Winthrop.
- Exhibit No. 8 Notice of Appearance and Comments by Ted Bolin, Winthrop.
- Exhibit No. 9 Reserved. No exhibit submitted.
- Exhibit No. 10 Letter dated March 22, 1988, from Arlie Clinkenbeard, Chairman, Board of County Commissioners, Okanogan County.
- Exhibit No. 11 Reserved. No exhibit submitted.
- Exhibit No. 12 Letter dated March 24, 1988, from Charles D. and Marilyn K. Dagnan.

- Exhibit No. 13 Reserved. No exhibit submitted.
- Exhibit No. 14 Letter, dated March 17, 1988, from Harold H. Heath.
- Exhibit No. 15 Reserved. No exhibit submitted.
- Exhibit No. 16 Letter and plan sheets dated March 27, 1988, from Harold Heath.
- Exhibit No. 17 Letter dated April 15, 1988, from Janet Alstott Gregg.
- Exhibit No. 18 Letter dated April 15, 1988, from Larry Whiteman, Executive Director of the Cascade Loop Association.
- Exhibit No. 19 Letter dated April 18, 1988, from Paul E. Christen, President, North Cascade Highway Association.
- Exhibit No. 20 Letter dated April 18, 1988, from Jim and Jan Gregg.
- Exhibit No. 21 Letter dated March 29, 1988, from Terry L. Kano.
- Exhibit No. 22 Letter dated April 5, 1988, from Walter R. Holcomb, Okanogan County Electric Co-Operative.

VIII

As a result of evidence and public concern at and subsequent to the hearing, the Department has made several changes to the plan. Several approaches have been added or moved. Right of way

was revised in one area to avoid a riparian area along the Methow River. The vertical profile was lowered in areas to minimize driveway slopes and to lessen the impact on the Rockview Irrigation Canal.

IX

The Commission has considered evidence on the entire portion of the above entitled highway and finds the plans introduced into evidence marked Exhibit Nos. 7a through 7o should be modified as hereinafter set forth and as shown on Exhibit "A" attached.

1. Revise plan sheets 1 and 4 of 15 sheets to add Parcel Nos. 2-02711, 2-02712, 2-02713, 2-02714.

This plan revision is the result of the subdivision of Mr. Heath's Parcel No. 2-02677 that was platted after the plans were approved. This plan revision is recommended by the Department.

2. Revise plan sheet 4 of 15 to relocate the Type C-3 approach for Parcel No. 2-02674 from between Sta. 422+50 and 423+75 Lt. to between Sta. 422+50 and 424+00 Lt. and is recommended by the Department to provide a more acceptable grade for this approach.
3. Revise plan sheet 4 of 15 sheets to delete the Type C-2-3 approach, for Parcel No. 2-02676, between Sta. 423+50 and 424+00 Rt.; revise the Type C-3 approach for Parcel No. 2-02676 between Sta. 422+25 and 422+75 Rt. to between Sta. 421+30 and 422+00 Rt. as recommended by the Department.
4. Revise plan sheet 4 of 15 sheets to relocate the right of way and limited access line between Sta. 420+00 and

Sta. 426+00 Rt. to reduce the impact on adjacent property as recommended by the Department.

5. Revise plan sheet 4 of 15 sheets to revise Parcel No. 2-02677 to delete the Type C-3 approach between Sta. 432+00 and 433+00 Lt.; revise the Type C-2-3 approach between Sta. 423+50 and 424+00 Rt. to a Type C-3 approach and relocate the approach to between Sta. 424+50 and 426+00 Rt.; and revise the Type C-3 approach between Sta. 430+00 and 431+00 Lt. to a Type C-2-3 and relocate the approach to between Sta. 432+00 and 432+50 Lt., this approach will be a joint-use approach to serve Parcel Nos. 2-02677, 2-02711, 2-02712, 2-02713, as requested by Mr. Heath in Exhibit No. 16 and by Jim and Jan Gregg in Exhibit No. 20, and is recommended by the Department.
6. Revise plan sheet 4 of 15 sheets to add a Type C-3 approach between Sta. 434+50 and 435+00 Lt. for Parcel No. 2-02714 as requested by Jim and Jan Gregg in Exhibit No. 20. This revision is necessary to provide access to Parcel No. 2-02714 created by the subdivision of Parcel No. 2-02677 and is recommended by the Department.
7. Revise plan sheet 5 of 15 sheets to revise Parcel No. 2-02677, to relocate the Type C-3 approach from between Sta. 437+00 and 438+00 Lt. to between Sta. 448+00 and 453+00 Lt.; and to relocate the Type C-3 approach from between Sta. 445+00 and 450+00 Rt. to between Sta. 445+00 and 447+00 Rt. as requested by Mr. Heath in Exhibit No. 16 and is recommended by the Department.
8. Revise plan sheet 5 of 15 sheets to relocate the Type C-3 approach for Parcel No. 2-02678 from between

Sta. 438+00 and 443+00 Lt. to between Sta. 442+50 and 443+00 Lt. This plan revision is recommended by the Department to provide a more desirable grade for this approach.

9. Revise plan sheet 5 of 15 sheets to add a Type C-3 approach for Parcel No. 2-02679 from between Sta. 453+20 and 454+20 Lt. as requested by Mr. Heath in Exhibit No. 16 and is recommended by the Department.
10. Revise plan sheet 6 of 15 sheets to delete the Type C-3 approach for Parcel No. 2-02680 between Sta. 468+00 and 469+00 Rt.; and to add a Type C-3 approach at Sta. 471+00 Lt. as requested by Mr. Holcomb in Exhibit No. 22 and recommended by the Department.
11. Revise plan sheet 6 of 15 sheets to add Parcel No. 2-02684 as a joint-user, with Parcel No. 2-02681, of the Type C-2-3 approach at Sta. 497+10 Lt. as requested by Mrs. Cotner on pages 67 and 68 of the hearing transcript and is recommended by the Department.
12. Revise plan sheet 6 of 15 sheets to delete the Type C-2-3 approach for Parcel No. 2-02686 at Sta. 497+10 Lt. as recommended by the Department. Parcel No. 2-02686 was incorrectly listed as having access at this point on the plan.
13. Revise plan sheet 7 of 15 sheets to relocate the Type C-3 approach for Parcel No. 2-02683 from between Sta. 526+50 and 527+50 Rt. to between Sta. 528+00 and 530+00 Rt. as recommended by the Department to provide a more acceptable grade for the approach.

14. Revise plan sheet 7 of 15 sheets to relocate the Type C-3 approach for Parcel No. 2-02686 from between Sta. 507+00 and 509+00 Lt. to between Sta. 507+00 and 511+00 Lt. as requested by Mr. Heath in Exhibit No. 16 and is recommended by the Department.
15. Revise plan sheet 8 of 15 sheets to relocate the Type C-3 approach for Parcel No. 2-02683 from between Sta. 537+50 and 538+50 Lt. to between Sta. 539+00 and 540+00 Lt.; redesignate the Type C-3 approach between Sta. 547+00 and 550+00 Lt. to a Type C-2-3 approach to be used jointly by Parcel Nos. 2-02683 and 2-02687; and to delete the Type C-3 approach between Sta. 553+00 and 550+00 Lt. as requested by Mr. Heath in Exhibit No. 16 and recommended by the Department.
16. Revise plan sheet 9 of 15 sheets to delete the Type C-3 approach for Parcel No. 2-02683 between Sta. 577+00 to 579+00 Lt.; to relocate the Type C-3 approach from between Sta. 577+00 and 579+00 Rt. to between Sta. 577+00 and 582+00 Rt.; to add Type C-3 approaches between Sta. 581+00 and 581+50 Lt., and Sta. 588+00 and 590+00 Rt. as requested by Mr. Heath in Exhibit No. 16 and recommended by the Department.
17. Revise plan sheet 9 and 10 of 15 sheets to relocate the right of way line on the left between Sta. 577+58.98 and Sta. 598+32.70 Lt. The Department will be acquiring and retaining the right of way between the old highway and the new alignment as mitigation measures for riparian habitat.
18. Revise plan sheet 10 and 11 of 15 sheets to relocate the right of way and limited access line between Sta. 620+00 and Sta. 629+00 on the left as recommended

by the Department to lessen the impact of the highway on the Methow River in this area.

19. Revise plan sheet 14 of 15 sheets to redesignate the Type C-3 approach for Parcel No. 2-02700 from Sta. 730+50 Lt. to between Sta. 734+00 and 736+00 Lt.; to redesignate the Type C-3 approach for Parcel No. 2-02701 between Sta. 734+00 and 736+00 Lt. to a joint-use Type C-2-3 approach. This revision was recommended by the Department.
20. Revise plan sheets 1 through 15 of 15 sheets to make minor plan revisions and to correct ownerships and parcel details, area computations, and right of way details.

X

The Commission also considered the following requests made at or subsequent to the hearing within the 10-day open record period and makes the following findings:

1. Mr. Holcomb, in Exhibit No. 22, requested a Type C-3 approach between Sta. 468+00 and 469+00 Rt. for Parcel No. 2-02680.

The right of way needed for the project will leave Parcel No. 2-02680 without any property on the right side of the highway; therefore, this parcel will not have a need for an approach at the requested location.

2. Mr. Roberts on pages 86 and 87 of the hearing transcript suggested using the Wolf Creek Road as a detour route during construction.

The Department does not intend to use any detours during construction.

3. Mr. Dagnon, in Exhibit No. 12, requested an underpass be constructed to allow movement of livestock from one portion of his property to the other.

The Type C-3 approach for Parcel No. 2-02699, located between Sta. 707+00 and 709+00 Lt. and Rt., can be used to move livestock across the highway.

4. Mr. Heath, in Exhibit No. 16, requested underpasses be constructed to allow movement of livestock and equipment from one portion of his property to the other.

There are no existing undercrossings at these requested locations, and limited funding precludes construction of new cattle or equipment undercrossings. Approaches will be built in the requested undercrossing locations to allow either crossing or access to the highway. Since sight distance will be greatly increased, the potential for accidents will be substantially reduced. Cattle are moved infrequently across the road. This can be accomplished by temporarily stopping traffic and allowing the cattle to cross from one side to the other. Machinery could cross or use the facility more safely after construction than at present.

XI

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

Based upon the foregoing findings and the evidence supporting them, the Transportation Commission of the state of Washington

ORDERS:

I

That the section of SR 20 in Okanogan County described as follows is hereby designated as a limited access highway of the modified controlled type:

Between Sta. 409+47.89 and Sta. 769+00 as shown on sheets 1 through 15 of 15 sheets entitled "SR 20, WEEMAN BRIDGE VICINITY TO WINTHROP, MP 185.56 to MP 192.37, OKANOGAN COUNTY," dated February 5, 1988.

II

That the plan set forth in Exhibit Nos. 7a to 7o for the establishment of access control on 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 sheets 1 and 4 of 15 sheets to add Parcel Nos. 2-02711, 2-02712, 2-02713, and 2-02714.
2. Revise plan sheet 4 of 15 sheets to relocate the Type C-3 approach for Parcel No. 2-02674 from between Sta. 422+50 and 423+75 Lt. to between Sta. 422+50 and 424+00 Lt.

3. Revise plan sheet 4 of 15 sheets to delete the Type C-2-3 approach for Parcel No. 2-02676, between Sta. 423+50 and 424+00 Rt.; revise the Type C-3 approach for Parcel No. 2-02676 between Sta. 422+25 and 422+75 Rt. to between Sta. 421+30 and 422+00 Rt.
4. Revise plan sheet 4 of 15 sheets to relocate the right of way and limited access line between Sta. 420+00 and Sta. 426+00 Rt.
5. Revise plan sheet 4 of 15 sheets to revise Parcel No. 2-02677 to delete the Type C-3 approach between Sta. 432+00 and 433+00 Lt.; revise the Type C-2-3 approach between Sta. 423+50 and 424+00 Rt. to a Type C-3 approach and relocate the approach to between Sta. 424+50 and 426+00 Rt.; and revise the Type C-3 approach between Sta. 430+00 and 431+00 Lt. to a Type C-2-3 and relocate the approach to between Sta. 432+00 and 432+50 Lt.; this approach will be joint-use approach to serve Parcel Nos. 2-02677, 2-02711, 2-02712, and 2-02713.
6. Revise plan sheet 4 of 15 sheets to add a Type C-3 approach between Sta. 434+50 and 435+00 Lt. for Parcel No. 2-02714.
7. Revise plan sheet 5 of 15 sheets to revise Parcel No. 2-02677, to relocate the Type C-3 approach from between Sta. 437+00 and 438+00 Lt. to between Sta. 448+00 and 453+00 Lt.; and to relocate the Type C-3 approach from between Sta. 445+00 and

450+00 Rt. to between Sta. 445+00 and 447+00 Rt.

8. Revise plan sheet 5 of 15 sheets to relocate the Type C-3 approach for Parcel No. 2-02678 from between Sta. 438+00 and 443+00 Lt. to between Sta. 442+50 and 443+00 Lt.
9. Revise plan sheet 5 of 15 sheets to add a Type C-3 approach for Parcel No. 2-02679 from between Sta. 453+20 and 454+20 Lt.
10. Revise plan sheet 6 of 15 sheets to delete the Type C-3 approach for Parcel No. 2-02680 between Sta. 468+00 and 469+00 Rt.; and to add a Type C-3 approach at Sta. 471+00 Lt.
11. Revise plan sheet 6 of 15 sheets to add Parcel No. 2-02684 as a joint-user, with Parcel No. 2-02681, of the Type C-2-3 approach at Sta. 497+10 Lt.
12. Revise plan sheet 6 of 15 sheets to delete the Type C-2-3 approach for Parcel No. 2-02686 at Sta. 497+10 Lt.
13. Revise plan sheet 7 of 15 sheets to relocate the Type C-3 approach for Parcel No. 2-02683 from between Sta. 526+50 and 527+50 Rt. to between Sta. 528+00 and 530+00 Rt.
14. Revise plan sheet 7 of 15 sheets to relocate the Type C-3 approach for Parcel No. 2-02686 from between Sta. 507+00 and 509+00 Lt. to between Sta. 507+00 and 511+00 Lt.

15. Revise plan sheet 8 of 15 sheets to relocate the Type C-3 approach for Parcel No. 2-02683 from between Sta. 537+50 and 538+50 Lt. to between Sta. 539+00 and 540+00 Lt.; redesignate the Type C-3 approach between Sta. 547+00 and 550+00 Lt. to a Type C-2-3 approach to be used jointly by Parcel Nos. 2-02683 and 2-02684; and to delete the Type C-3 approach between Sta. 553+00 and 550+00 Lt.
16. Revise plan sheet 9 of 15 sheets to delete the Type C-3 approach for Parcel No. 2-02683 between Sta. 577+00 to 579+00 Lt.; to relocate the Type C-3 approach from between Sta. 577+00 and 579+00 Rt. to between Sta. 577+00 and 582+00 Rt.; to add Type C-3 approaches between Sta. 581+00 and 581+50 Lt., and Sta. 588+00 and 590+00 Rt.
17. Revise plan sheet 9 and 10 of 15 sheets to relocate the right of way line on the left between Sta. 577+58.98 and Sta. 598+32.70 Lt.
18. Revise plan sheet 10 and 11 of 15 sheets to relocate the right of way and limited access line between Sta. 620+00 and Sta. 629+00 on the left.
19. Revise plan sheet 14 of 15 sheets to redesignate the Type C-3 approach for Parcel No. 2-02700 from Sta. 730+50 Lt. to between Sta. 734+00 and 736+00 Lt.; to redesignate the Type C-3 approach for Parcel No. 2-02701 between Sta. 734+00 and 736+00 Lt. to a joint-use Type C-2-3 approach.

20. Revise plan sheets 1 through 15 of 15 sheets to make minor plan revisions and to correct ownerships and parcel details, area computations, and right of way details.

III

That the plan entitled, "SR 20, WEEMAN BRIDGE VICINITY TO WINTHROP, MP 185.56 TO MP 192.37, OKANOGAN COUNTY," sheets 1 through 15 of 15 sheets, dated February 5, 1988, as revised above and as shown in Exhibit "A," and by the same is hereby adopted.

That the following plan is hereby superseded:

"SR 20, WINTHROP WEST," Right of Way, Okanogan County, sheet 1 of 1 sheet, approved October 30, 1951.

ADOPTED this 13th day of April, 1989.

WASHINGTON STATE TRANSPORTATION COMMISSION

William J. Kamps
WILLIAM J. KAMPS, Chairman

Richard Odabashian
RICHARD ODABASHIAN, Vice Chairman

Bernice Stern
BERNICE STERN, Member

Leo B. Sweeney
LEO B. SWEENEY, Member

Albert D. Rosellini
ALBERT D. ROSELLINI, Member

James Henning
JIM HENNING, Member

Norm Mc Kibben
NORM MC KIBBEN, Member

ATTEST:

Lue Clarkson
LUE CLARKSON, Administrator

APPROVED AS TO FORM:

Meadore Stone
Assistant Attorney General