

No. 34550-1

**COURT OF APPEALS, DIVISION II
OF THE STATE OF WASHINGTON**

**LEWIS COUNTY,
Appellant and Cross-Respondent,**

v.

**MICHAEL T. VINATIERI, et al.,
Respondents and Cross-Petitioners,**

**WESTERN WASHINGTON GROWTH
MANAGEMENT HEARINGS BOARD,
Agency Respondent.**

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STATE OF WASHINGTON
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**LEWIS COUNTY'S REPLY BRIEF AND RESPONSE
TO CROSS APPEAL**

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I. LEWIS COUNTY RESPONSE ON THE MERITS

The case before the Court is a matter of form versus substance in consideration of changes to the County Comprehensive Plan addressed during a compliance proceeding to amend the County Comprehensive Plan and development regulations to comply with the Washington State Growth Management Act. Ch. 36.70A RCW.

The case also raises the limits of the authority of Growth Boards to rule on matters outside “compliance” with the Growth Management Act, and rule on the “validity” of the ordinance.

A. The Abplanalp Request

The question raised in this issue is whether the Lewis County Board of County Commissioners may respond to a request made during a public hearing to have certain farm lands withdrawn from lands proposed by the Planning Commission to be included in farm lands of long-term commercial significance.

The maps forwarded by the Planning Commission (As identified in Res. 03-368, AR 584)¹ recommended certain properties be included in lands of long-term commercial significance. The designated resource lands included a farm owned by Mr. Abplanalp.

¹ Copies of portions of the record—both Administrative Record (AR) and Clerk’s Papers (CP) were attached to Lewis County’s Opening Brief of September 25, 2006.

The Board of County Commissioners scheduled a public hearing to hear testimony on September 8, 2003:

For the purpose of taking testimony concerning proposed amendments to the Comprehensive Plan and zoning regulations, designating agricultural land of long-term commercial significance. Those wishing to testify concerning this should attend.

A complete copy of the proposed amendments is available for review at no cost at: Lewis County Community Development . . . Publish 8/27/03

CP 428.²

At the public hearing Mr. Abplanalp testified and requested that his property be removed from the designation because it did not fit the criteria for long-term commercial significance. While Vinatieri et al. (and specifically Mr. Butler) attended the public hearing and testified after Mr. Abplanalp, no objection was raised to the request at the time. *See* BOCC meeting minutes of September 8, 2003, CP 434-435.

During the proceedings Robert Johnson, Principal Planner, for Lewis County Planning Division, clarified that Mr. Abplanalp had an individual rezone request pending and the County Planning Commission had not docketed individual rezone requests, but rather dealt with the County as a whole. Contrary to the suggestion by Vinatieri in their briefing, nowhere in the record cited by Vinatieri is there any evidence

² CP 428 is attached hereto for the Court's convenience. Copies of all other significant citations to the record were attached to Lewis County's Opening Brief.

that Mr. Johnson advised the County Commissioners or the public that the County could not or would not consider the matter at the hearing.

In Finding 19 and Conclusion G of the final decision the Growth Board found that Vinatieri et al. had opportunity to participate in the proceedings below and that the County could, consistent with the Growth Management Act, make final adjustments to the Planning Commission recommendation. RCW 36.70A.035(2)(b)(ii) permits those changes “without additional hearings” if:

The proposed change is within the scope of the alternatives available for public comment.

RCW 36.70A.035(2)(b)(ii).

Vinatieri’s argument is that the Planning Enabling Act, RCW 36.70.430, concerning adoption and changes to the Comprehensive Plan, require the Board of County Commissioners, before making any change to a recommendation from the Planning Commission to (a) identify the change and (b) refer the change back to the Planning Commission for a new round of hearings. They also cite County Comprehensive Plan p. 1-3, which provides that the Board may “amend, supplement or modify the text and/or maps of the Lewis County Comprehensive Plan and that such amendment may be amended, adopted, or supplemented by the Board upon the recommendation of or concurrence of the Planning Commission after a public hearing.” (Vinatieri Brief at p. 21)

The problem with the Vinatieri analysis is that it envisions an endless loop in which the Board of County Commissioners are hamstrung

in making any change to the Comprehensive Plan even, as in this case, where the public proceedings had been ongoing for a year and the program was under a GMA compliance order which required final action by September 9, 2003.

The purpose of the September 8, 2003 public hearing was to take testimony concerning the proposed amendments to both the Comprehensive Plan and the enabling development regulations. The public notice advised that materials were available for review. Vinatieri et al. were not ignorant of the proceedings and were active participants in the public hearings and proceedings before the County and the Growth Board and were parties to the compliance order which required a final report by September 9, 2003.

Lewis County agrees with Vinatieri that Chapters 36.70 and 36.70A RCW must be read *in pari materia* to achieve a harmonious scheme. *Whatcom County v. Brisbane*, 125 Wn.2d 345, 354, 884 P.2d 1326 (1994). But to read the chapters harmoniously to carry out the legislative purpose, the courts must ask whether the purpose of both are achieved, and the answer is yes.

The Planning Commission had held a year of proceedings and had recommended maps to the Commission which included Mr. Abplanalp's property for agriculture zoning. The notice of proceedings before the Board of County Commissioners (CP 428) called for testimony on the recommendations of the Planning Commission, and materials were identified as available at the Community Development Department. At

the hearing, the Board voted to amend the maps (comprehensive plan and zoning) to delete the Abplanalp property from the agricultural resource land designations. The deletion was clearly within “the scope of alternatives” under consideration. As such, no further notice or public hearings were required. RCW 36.70A.035(2)(b)(ii).

The Growth Board found compliance with public participation (Finding 19). The record shows active participation supports the finding that public participation requirements were met in fact. The Vinatieri claim of error failed to reach the heavy burden of “clearly erroneous” under the facts of this case, RCW 36.70A.320(3), which is the standard by which the Growth Board must review any claim of error.³

The response brief of Vinatieri fails to demonstrate any factual error in Finding 19 of the Growth Board. The position that a citizen may not question the accuracy of a particular recommendation, or that a County Commission may not act on that testimony without reference to the Planning Commission prior to responding to a compliance order, is well outside any “harmonious reading” of the Planning Enabling Act and the Growth Management Act, and must be rejected. As such, the decision of the Growth Board approving public process and the Abplanalp request

³ . . . The board shall find compliance unless it determines that the action by the state agency, county, or city is clearly erroneous in view of the entire record before the board and in light of the goals and requirements of this chapter.
RCW 36.70A.320(3).

must be upheld and the Superior Court decision to the contrary reversed.
RCW 34.05.570(3)(d), (e).

**II. RESOLUTION 03-368 AND ORDINANCE 1179E WERE
ADOPTED WITH PUBLIC PROCESS AS REQUIRED BY
RCW 36.70A.035**

The challenge to Resolution 03-368 (AR 583-584) and Ordinance 1179E (AR 676-677) is a matter of form, not substance. The Planning Commission proceedings in August 2003 focused on the recommendations in two reports, a preliminary report (CP 379-397) and a supplemental report (CP 407-409) which culminated in a public hearing by the Planning Commission on August 26, 2003 and the adoption of the Planning Commission recommendations, which were forwarded to the Board of County Commissioners in response to a directive from the Western Washington Growth Management Hearings Board to address the designation of agriculture lands and the uses on agriculture lands.

The recommendations of the Planning Commission were all contained in the document entitled "In Re Recommendations of the Planning Commission to the Board of County Commissioners to Amend the Comprehensive Plan Resource Lands Maps and Chapter 17.200 Based Upon Reconsideration" and attachments. CP 423-424/AR 673-674.

The Planning Commission specifically defined the nature and needs of the County by adopting the preliminary and supplemental reports, *supra*. (*Ibid* at CP 423; AR 584) The recommendations were in report not ordinance or resolution format.

The Board of County Commissioners published a notice of public hearing calling for public testimony on the recommendations of the Planning Commission, and put the proposed amendments in ordinance and resolution form, ultimately adopted as Resolution 03-368 (AR 583-584) and Ordinance 1179E (AR 676-677). The notice did not contain a “summary” of the specific recommendations, but did provide:

A complete copy of the proposed amendments is available for review at no cost at: Lewis County Community Development.

CP 428.

Respondents’ claim of error before the Growth Board and the Court below is that the failure of the Planning Commission to make its recommendation in the form of an ordinance or resolution renders the ordinance and resolution adopted by the County “void.”

Respondents’ Response Brief and Opening Brief on Cross Appeal points to a host of regulations pertaining to the initiation of plan changes, the County’s annual process for amending comprehensive plans, and the overall requirements to provide full opportunity for the public to participate. But the fact of the matter is that the issue of agriculture resource lands has been at issue since the Growth Board’s Final Decision and Order dated June 30, 2000 in *Butler, et al. v. Lewis County*, WWGMHB No. 99-2-0027c. That order held the County had to redesignate its agriculture lands of long-term commercial significance. The issue of uses on resource lands was at issue from the Growth Board’s

March 5, 2001 Final Decision and Order in *Panesko v Lewis County*,
WWGMHB No. 00-2-0031c.

The proceedings at issue in this case addressed both issues of agricultural lands designation and uses on resource lands. These proceedings commenced in the summer of 2002 and continued through September 2003. Vinatieri et al. were active participants in all of the proceedings, giving ample testimony on both designation and use issues. Details are set out in Lewis County's Opening Brief at pp. 3-5, and in the Growth Board's May 6, 2004 decision, CP 35-45.

Respondents' claim of error assumes that the County Commissioners cannot fashion changes to the County's Comprehensive Plan (official controls) unless the Planning Commission recommendations were forwarded to the Board of Commissioners in ordinance form. This is simply not the case.

But, the Growth Board found the underlying Petitioners Butler, Vinatieri, et al. had ample notice of the issues and recommendations and that they had ample opportunity to participate. Vinatieri does not deny the participation, but argues that under the Planning Enabling Act, Ch. 36.70 RCW, without the Planning Commission putting their recommendations into ordinance or resolution form, that the recommendation could not be considered by the County Commissioners and that any changes to the recommendations had to be referred back to the Planning Commission. But the provisions of RCW 36.70.630 authorize the Board of County Commissioners to make changes in development regulations simply by

holding a public hearing, and, here, the public notice of that proceeding provided that “. . . a complete copy . . .” of the proposed amendments was available at the planning department.

The provisions of RCW 36.70A.035(2)(b)(ii) provide that “no” further public hearings are required if the matters affected by a County change are “within the scope of the alternatives available for public comment.”

The Growth Board appeal addressed adequate public participation. The statute on GMA public participation recognizes the complex proceedings attendant to achieving compliance with GMA mandates, and specifically provides:

The procedures shall provide for broad dissemination of proposals and alternatives, opportunity for written comments, public meetings after effective notice, provision for open discussion, communication programs, information services, and consideration of and response to public comments. . . . Errors in exact compliance with the established program and procedures shall not render the comprehensive land use plan or development regulations invalid if the spirit of the program and procedures is observed.

RCW 36.70A.140.

The materials provided in Respondents’ Response Brief do not contest the fact that the substance of the changes adopted by the County was included in the Planning Commission recommendations. Nor do they allege they did not actively participate in the process. Rather, the only objections are to the form of the recommendation—narrative in the

adoption of the preliminary and supplemental reports, as well as the resolution rather than in ordinance and plan format.

Finally, neither Respondents' brief nor the record below show Respondents raised any objection at the County Commissioners public hearing about any lack of material, and the belated effort to claim materials were not available until "after the hearing" (Response Brief at p. 36) is a blatant attempt to add post-proceedings testimony when the decision is to be based "on the record before the Growth Board." RCW 36.70A.320(3). This matter was not raised during the BOCC proceedings below. The record before the Growth Board shows the Board of County Commissioners held a public hearing, Respondents participated fully, and the County Commissioners adopted the recommendations of the Planning Commission in ordinance and resolution form, making only minor allowable changes to the lands included (*see* Abplanalp discussion *supra*).

Land use planning is a long and complex process. Since the advent of the GMA, the Growth Boards play an important role in assuring compliance with the GMA which is both substantive and procedural, and certainly does include the adequacy of public participation. RCW 36.70A.035, .300. But the Legislature also recognized that occasional procedural errors may occur and did not want a hyper technical reading of the rules to interfere with the Board's ability to assure timely compliance. Accordingly, RCW 36.70A.140 specifically provides that "technical errors" shall not render the comprehensive plan or the development

regulations invalid. And, further, RCW 36.70A.035 authorizes changes by the Board without additional public proceedings where:

(b) An additional opportunity for public review and comment is not required under (a) of this subsection if:

(ii) The proposed change is within the scope of the alternatives available for public comment;

RCW 36.70A.035(2)(b).

The guidance of RCW 36.70A.035(2)(b)(ii) and RCW 36.70A.140 recognize the realities of the planning process and instruct that not every change to a comprehensive plan is required to be reprocessed under RCW 36.70.430, as suggested by Vinatieri. Where the changes are minor or well within the framework of the larger proceeding under review and forwarded by the Planning Commission, the GMA does not require reprocessing.

Here, the ordinance and resolution adopted by the County are both within the scope of the alternatives recommended by the Planning Commission and adopted after a public hearing by the Board of County Commissioners to consider the recommendations of the Planning Commission. As such, the procedural requirements of the two chapters, RCW 36.70 and 36.70A, were met.⁴

The further condition that the proceedings were under compliance orders from the Growth Board in which Vinatieri et al. were participants

⁴ The same analysis instructs that the County's adoption comports with the process described in Lewis County Code. LCC 17.12.050.

provides further support for the Growth Board denying the hyper technical claims of specific notice of specific changes in lieu of a more broadly-based focus assuring that the parties in fact were given reasonable opportunity to participate.

The regulations specifically authorize the Growth Board to issue time schedules for “compliance.” WAC 242-02-890. Where a county is operating under an administrative order for achieving compliance in a given time frame, the Boards recognize that per RCW 36.70A.140 flexibility is granted to achieve the desired result. *See Burrow v. Kitsap Co.*, CPSGMHB No. 99-3-0018 (FDO, March 29, 2000) (recognizing the differences and latitude intended).

The record shows that the Vinatieri group participated fully, that the recommendations of the Planning Commission were incorporated into the resolution and ordinance for consideration by the Board of County Commissioners at the Board’s public hearing, that the Board of County Commissioners had its own hearing, and the only document in the record speaking to the subject stated the materials “were available” to the parties at the time the notice was published prior to the public hearing. The decision of the Growth Board that the public participation requirements were met is supported by the record. The decision of the Superior Court below reversing that decision was in error.

III. RESPONSE TO CROSS APPEAL

Finally, Respondents' cross appeal concerning procedural due process is without merit.⁵ The touchstone for consideration of constitutional procedural due process claims is notice and opportunity to testify. *See Thornton Creek Legal Defense Fund v. City of Seattle*, 113 Wn. App. 34, 56-57, 52 P.3d 522 (2002); *see also cf. Moss v. City of Bellingham*, 109 Wn. App. 6, 29, 31 P.3d 703 (2001) (holding that where complaining party had opportunity to challenge determination in appropriate forum provided by law, it could not show that it was prejudiced by earlier procedural irregularities). The record on public process shows ample notice of the issues under review and opportunity to participate. In fact, there is no dispute that Respondents' group did in fact testify and participate at all relevant times herein.⁶ Further, as the foregoing discussion demonstrates, there was no "manifest error" giving rise to a constitutional claim at this stage. *See* RAP 2.5(a). No constitutional issue is before the Court.

⁵ The County addresses the majority of the substance of the Respondents' cross appeal in the discussion above.

⁶ It is a well-settled practice that hearings boards do not address constitutional issues. *See, e.g., Futurewise v. Whatcom County*, WWGMHB Case No. 05-2-0013 (FDO, Sept. 20, 2005); *Roth v. Lewis County*, WWGMHB Case No. 04-2-0014c (Order on Motions to Dismiss, Sept. 10, 2004). In any event, any disagreement regarding the Growth Board's or trial court's authority in addressing constitutional issues here is moot, as the record does not show any constitutional violation. Simply put, Respondents had notice and were in fact heard.

IV. SUMMARY AND CONCLUSION

Vinatieri's claims are based on an effort to intertwine the entirety of the Planning Enabling Act and the Growth Management Act in such a fashion that no changes may be made to either the plan or the development regulations by a Board of County Commissioners from a recommendation of the Planning Commission without reinitiating the entire planning process for each proposed change. But the Legislature did not intend such a tortured result and specifically so provided in the authority cited above.

The decision of the Growth Board is supported by the record and is not shown to be either clearly erroneous or unlawful by the materials submitted—the appropriate standard of review by the Growth Board. RCW 36.70A.320(3). The decision of the Superior Court to the contrary is without factual support in the record and is an error of law requiring reversal under RCW 34.05.570(3)(d), (e).

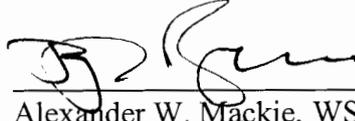
Finally, Respondents in fact had both notice and opportunity to be heard, and thus were afforded their due process rights with regard to the challenged proceedings.

The County asks the Court to affirm the decision of the Growth Board on the issues of public participation, the validity of Finding 19 and Conclusion G, and the effective adoption of the ordinance and plan amendment at issue.

DATED: February 28, 2007.

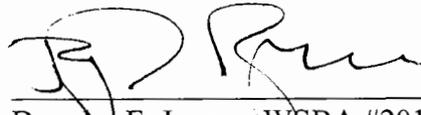
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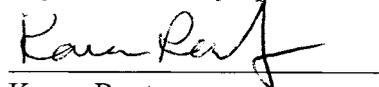
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DATED this 28th day of February, 2007, at Olympia, Washington.



Karen Rentz

NOTICE OF PUBLIC HEARING
Before the
LEWIS COUNTY BOARD OF COUNTY
COMMISSIONERS

NOTICE IS HEREBY GIVEN that the **LEWIS COUNTY, Washington, BOARD OF COUNTY COMMISSIONERS** will hold a public hearing on Monday, September 8, 2003 beginning at 10:30 a.m. at the Commissioner's Hearing Room, located inside the Historic Courthouse at 351 NW North St, Chehalis, WA 98532. The hearing will be for the purpose of taking testimony concerning proposed amendments to the Comprehensive Plan and zoning regulations, designating agricultural land of long-term commercial significance. Those wishing to testify concerning this matter should attend.

A complete copy of the proposed amendments is available for review at no cost at:

Lewis County Community Development
350 North Market Blvd.
Chehalis, WA 98532
Or at: www.co.lewis.wa.us

For more information, contact:

Robert A. Johnson, Principal Planner
Lewis County Planning Division
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This meeting site is barrier free; people needing special assistance or accommodations should contact the Planning Division 72 hours in advance of the meeting. Phone: (360) 740-1144.

/s/ Robert A. Johnson, Principal Planner

Publish: 8/27/2003

CP 428

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COURT OF APPEALS

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MANAGEMENT HEARINGS BOARD,
Agency Respondent**

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SUSAN ROTH declares as follows:

On the date set forth below I caused the Original and one copy of the RESPONDENT RESPONSE BRIEF AND OPENING BRIEF ON CROSS APPEAL and this CERTIFICATE OF SERVICE to be filed with the Washington State Court of Appeals, Division Two, 950 Broadway, Suite 300, Tacoma, WA 98402-4454 by deposit in the U. S. Mail, first class postage prepaid.

I caused one copy to be served by US Mail, first class postage prepaid, upon each of the parties below:

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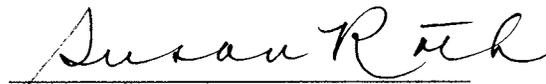
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I declare under penalty of perjury under the laws of the State of
Washington that the foregoing is true and correct.

Signed at Chehalis, Washington on November 29, 2006.



SUSAN ROTH