

1 development, and native American reservation planning up to city and county comprehensive
2 planning. Since the adoption of the Growth Management Act in 1990, I have participated in
3 many comprehensive planning programs for jurisdictions including Jefferson, Clark, Skagit, and
4 Kittitas Counties, and cities such as Union Gap, Skykomish, Shoreline, Orting, College Place,
5 Newcastle, Everett, and Duvall. All of these assignments also involved environmental review
6 under SEPA.

7 Q What is your present occupation, profession, and what are your duties and responsibilities?
8

9 A I am Director of Community Design for the Seattle office of Berryman & Henigar, Inc., a
10 national consulting firm. In addition to the above-noted GMA comprehensive planning work,
11 my experience also includes subarea and neighborhood planning for Seattle, Mill Creek, Sultan,
12 Kitsap County, and Skagit County. I have consulted in assessing and/or written development
13 regulations for Walla Walla County, Orting, Bainbridge Island, Seattle, and Sultan. I supervise
14 a staff of four professional planners currently preparing shoreline master programs, critical area
15 ordinances, and permit procedures for jurisdictions including Port Townsend, Darrington, Gold
16 Bar, Maple Valley, and Mercer Island as well as providing “current” planning services to a
17 number of jurisdictions in which we provide assistance in reviewing land use permit
18 applications as adjuncts to local staff. I served 6 years on the City of Seattle Planning
19 Commission, including 2 as chair. I have been President of the Puget Sound Section and the
20 Washington State Chapter of the American Planning Association. In 2000 I was honored by
21 being elected to the College of Fellows of the American Institute of Certified Planners. I am a
22 member of the Professionals’ Council for the University of Washington Department of Urban
23 Planning and a similar body for the planning program at Eastern Washington University. I
24 currently serve as co-chair of the Seattle Chapter AIA Urban Design Committee
25

EXHIBIT 41 R (RW-R)-2
ROGER WAGONER
REBUTALL PREFILED TESTIMONY

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Q Would you please identify what has been marked for identification as Exhibit 41 R-1 (RW-R-1).

A Exhibit 41 R-1 (RW-R-1) is a résumé of my educational background and employment experience.

Q What does RCW 36.70.B (the 1995 Regulation Reform Act) require regarding application submittal requirements?

A It mandates that the submittal requirements be stated up front for all applications, including the content needed to make an application complete: RCW 36.70B.080 provides as follows: “The development regulations must, for each type of permit application, specify the contents of a completed project permit application necessary for the complete compliance with the time periods and procedures.”

Q Why is this required?

A The intent statement of the statute states that “The project review process, including the environmental review process under chapter 43.21.C RCW and the consideration of consistency, should start from this point and should not reanalyze these land use decisions in making a permit decision.” The “point” referenced is the foundation provided through the comprehensive plan within which the land use and infrastructure decisions are made prior to the permit review and approval process. The legislature felt it

1 very important to ensure that these over-arching plan decisions were made prior to any
2 related and subsequent permit decisions.

3
4 Q Has Kittitas County adopted such requirements for the wind farm overlay ordinance?

5
6 A Chapter 17.61A KCC refers to other titles of the code with respect to the application
7 requirements for approval of projects through the wind farm resource overlay zone. This
8 is primarily directed towards the provisions for development agreements as prescribed in
9 15A.11 KCC and for site-specific comprehensive plan amendments (15B.03KCC) and
10 rezones (17.98 KCC). With respect to the development agreement provisions, 15A.11
11 does not specify the required information for an application. It merely states that the
12 “request should describe the project and the specific reasons why the project is suitable
13 for a development agreement.” With respect to comprehensive plan amendments, 15B.03
14 provides no specific direction for the format of applications. While the Kittitas Valley
15 Wind Project is not, of course, a permit application, the linkage of the comprehensive
16 plan amendment to the wind farm resource overlay zone permit “family” makes such an
17 amendment part of that permit process. Similarly, chapter 17.98 KCC provides no
18 specific application requirements for a zoning amendment other than reference to “forms
19 prescribed by the planning administrator” and legal description and location. The
20 County’s “Development Activities Application” form and “Application for Development
21 Agreement” form provide further application requirements, but are not tied by reference
22 to the wind farm ordinance.

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23
24
25 EXHIBIT 41 R (RW-R)-4
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1 Q Where a county has not complied with the requirements to clearly state application
2 submittal requirements, and when an applicant submits a "draft" application for
3 preliminary review and comment, particularly under a newly adopted regulatory process,
4 would you expect the draft to include final signature of all landowners owning the
5 underlying property, fully developed adjacent property lists for public notification, or
6 even an applicant signature?
7

8 A My experience is that in such cases, the permitting agencies have tried to accommodate
9 the applicant through pre-application meetings and consultations to identify and clarify
10 the intent of the underlying legislation and to formulate an approach to preparing a
11 complete application. Therefore, a reasonable process would accommodate draft
12 application submittal and review, and a signature would not be expected or required as
13 long as the intent was for an "internal" pre-consistency review to ensure that all of the
14 jurisdiction's expectations were addressed.
15

16 Q Zilkha Renewable Energy has attempted to seek permitting through EFSEC, which
17 requires "reasonable efforts" to seek consistency with local zoning provisions. Is it
18 reasonable in a process of this kind, with a new and untested zoning ordinance, for an
19 applicant to seek total clarity from a county regarding the scope, timing and requirements
20 of the local review as it dovetails with the EFSEC process?
21

22 A While "total" clarity is as ambiguous as "reasonable", in practice it should be a public
23 service responsibility of the permitting agency to ensure that the "playing field is level"
24 by providing enough assistance to the applicant to ensure that his/her understanding of
25

1 the application requirements and procedural obligations of the jurisdiction including
2 review timing, public hearing notifications, and decision protocols are as clear as those
3 for all other usual types of land use permits.

4
5 Q Are you aware of the County's efforts to amend its code to enable the Trendwest
6 Mountain Star Resort?

7
8 A Only very nominally.

9
10 Q Please explain why the County needed to amend its code for this the resort.

11
12 A It is my understanding that after the GMA was amended to enable the permitting of
13 master planned resorts in rural areas, the counties that wished to do so had to adopt
14 comprehensive plan goals and policies and implementing regulations for such
15 developments. It appears from Kittitas County's approach in adopting the Master Plan
16 Resort provisions in its code that the County crafted a process to combine the plan and
17 zoning amendments along with the permitting process in order to enable the Mountain
18 Start Resort project through one consolidated process.

19
20 Q Do you have an opinion regarding the reasonableness of using this model for reviewing
21 and permitting other projects that require simultaneous comprehensive plan amendments?

22
23 Q The County's Mountain Star resort process was designed to meet a specific GMA
24 mandate dealing with very complex planning and regulatory issues. In my opinion, the

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EXHIBIT 41 R (RW-R)-6
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1 instant case is much less so. To elaborate, the GMA acknowledges the need for, and the
2 value of, subarea plans that provide a “bridge” between the overall jurisdiction-wide
3 comprehensive plan goals and policies and the need for more area-specific policy
4 direction related to the implementation of particular visions or expectations for certain
5 development opportunities that the area in question exhibits. In the case of master
6 planned resorts, this approach was amended into the GMA to ensure that such
7 developments could be planned to ensure that they would not result in non-compliance
8 with the GMA goals. Such potential non-compliance included the inappropriate
9 extension of urban infrastructure (*e.g.* municipal water and wastewater service) and
10 violation of the “anti-sprawl” goals, through adopting inappropriate development
11 densities. The fact that the GMA enables the adoption of subarea plans more frequently
12 than the normal comprehensive plan annual update limitation demonstrates the value of
13 this process.

14
15 Frequently, subarea plans focus on economic development strategies for the
16 redevelopment or revitalization of community centers or otherwise marginal lands that
17 require special investment in public infrastructure, public/private partnerships, or special
18 regulatory frameworks to achieve the general intent of the comprehensive plan. Recent
19 examples have been adopted by Mill Creek, Newcastle, Sultan, Monroe, and other cities.

20
21 In unincorporated areas of counties, subarea plans such as those recently produced by
22 Pierce and Skagit Counties involve intensive outreach and communications with the
23 “stakeholders” including property owners, residents, business owners, and advocacy
24 groups to replicate the usual comprehensive plan process of identifying issues,

25 EXHIBIT 41 R (RW-R)-7
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1 conducting inventories and analyses, drafting goals and policies, evaluating alternative
2 zoning patterns, and producing capital facilities plans for infrastructure. These are done
3 for both rural and urban growth areas. In the latter case, the subarea plans are frequently
4 the basis for amendments to the county comprehensive plan that adjust the size and
5 configuration of the UGA.

6
7 But the salient conclusion here is that these planning steps need to be completed before
8 new permits are granted.

9
10 Q What are the problems related to mixing comprehensive plan amendments and
11 permitting-siting processes?

12
13 A The objective of subarea planning is to fine-tune the comprehensive plan (and possibly
14 the development code) to address specific physical features of the area; engage the
15 stakeholders with specific interests in the area; formulate alternative approaches to
16 resolving the issues or to achieving the vision; and ensure that the preferred alternative is
17 consistent with the overall goals and objectives of the Comprehensive Plan. The resulting
18 adopted subarea plan also provides discrete capital facilities plans for public and private
19 infrastructure phasing and funding that address both current area needs as well as
20 concurrency standards associated with new development. Then, the site-specific,
21 individual objectives of the property owners or development interests can be addressed
22 through the development permit application and approval process based on the subarea
23 plan. Presuming that the development interests have participated in the subarea planning
24 process, their understanding of the outcome should inform their internal planning and
25

EXHIBIT 41 R (RW-R)-8
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1 therefore enable them to formulate their plans with few iterations. Similarly, the
2 permitting agency should be able to expedite the permit process since the decision
3 standards and criteria have been established in direct anticipation of the type of land use
4 and development proposed. In some cases, the subarea plan supports “planned actions”
5 under SEPA that reduce the individual project application responsibilities for
6 environmental review if the proposal is consistent with the subarea plan.

7
8 When the subarea planning process and the permitting process are combined, it is
9 difficult to see how an applicant could get clear direction from the jurisdiction regarding
10 the required format and substance of the application and how to address the approval
11 standards and criteria when those standards and criteria have not yet emerged from the
12 planning process. This would seem to create a “mobius loop” of many iterations of pre-
13 application, application submittal, determination of application-incompleteness,
14 administrative interpretation, application re-submittal, and other activities that would go
15 on and on until the final subarea plan public hearing and subarea plan adoption are
16 completed. This is because the subarea plan itself should establish fundamental planning
17 concepts, goals and polices which are typically intended to reconcile with existing
18 comprehensive plan goals and policies, and which typically provide legislative or policy
19 guidance for future development permit applicants. It is antithetical to the purpose of
20 linking project-level implementation with comprehensive planning to combine these
21 processes together. Such a combined process leads to confusion and contradiction. The
22 nature of the interaction between the applicant and the County is different for the
23 legislative (planning) and quasi-judicial (permitting) actions, therefore creating possible
24 conflicts with the appearance of fairness doctrine. This could result when applicants, or

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1 others, can meet individually with the decision-makers to discuss the plan, when the very
2 same process governs the approval of site-specific development permits. Also, the
3 legislative process is not governed by the same kind of objective review and approval
4 criteria that apply to permit decisions. In mixing the two, therefore, there is the risk of
5 politicizing the permitting process.

6
7 Q What are the ramifications for an applicant under the Regulatory Reform Act of a process
8 which integrates subarea plan amendments, rezones, development agreements and site
9 specific permits into one consolidated project?

10
11 A The Regulatory Reform Act deals only with procedures of local government review and
12 approval of applications for land development. It has no bearing on the process of
13 producing comprehensive (or subarea) plans. Consequently, it is difficult to envision that
14 permit activities which are regulated by the Act could be fairly and objectively
15 administered when embedded within a planning process that has no such limitations. In
16 some cases, an applicant may file a permit application under the pre-existing regulations
17 and the jurisdiction will be obligated to process the application under the provisions of
18 the Act and its related rules, during the time that the subarea planning is underway. Some
19 jurisdictions avoid this potential conflict by implementing moratoria to hold off permit
20 applications until the subarea plan is done. This results in a clear demarcation between
21 legislative and quasi-judicial actions and protects the rights of the applicants and the
22 public. This demarcation between legislative (planning and zoning) and quasi-judicial
23 (site-specific permitting) processes is typically considered desirable, both for the public
24

25
EXHIBIT 41 R (RW-R)-10
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1 and for applicants, to ensure the integrity of the community's GMA-based comprehensive
2 plan policies, and to protect the rights of applicants.

3
4 Other than create confusion between the permitting agency technical staff and the
5 applicant, this also has the potential of creating even more confusion within the decision-
6 making body(ies) and with the public. How is the community within the subarea to
7 absorb information and react effectively if the jurisdiction and applicant are negotiating
8 the terms and conditions of the development agreement and mitigation, when at the same
9 time, the planning staff is seeking input regarding goals and objectives at a much higher
10 level than the site-specific project?

11
12 Q Is such a process compatible with the GMA and the 1995 Regulatory Reform Act?

13
14 A While this approach may be "compatible" with the general intent of the GMA (linking
15 comprehensive planning for specific areas and then working through projects that
16 implement the plans with expedited review), it is not compatible with the intent of the
17 1995 Regulatory Reform Act where the legislature stated that the underlying land use
18 decisions and related implementation standards need to be determined before permit
19 processes can be initiated. It is very unusual, in my experience (both personal in
20 planning projects, as well as in observing projects by others) that jurisdictions would
21 encourage or entertain the process of reviewing and approving a site-specific
22 development permit during, or as part of, the preparation of a subarea plan. In fact,
23 sometimes jurisdictions "freeze" development permit activity through moratoria to enable
24 the subarea planning process to be conducted objectively without encumbering the staff

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EXHIBIT 41 R (RW-R)-11
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1 or decision-making officials in having to make judgment calls that could involve
2 interpreting the intent of the on-going policy discussion for the plan in anticipating the
3 standards and approval criteria for the permit action before the policy “foundation” has
4 been laid down through the public hearing process.

5
6 Q What are the potential due process abuses the Regulatory Reform Act aimed to
7 eliminate?

8
9 A “Conflict, overlap, and duplication between various permit and review procedures. . . .
10 This regulatory burden has significantly added to the cost and time needed to obtain local
11 and state land use permits and has made it difficult for the public to know how and when
12 to provide timely comments on land use proposals that require multiple permits and have
13 separate environmental review processes.” (RCW 36.70B.010)

14
15 Q On page 10 of Clay White’s testimony the County alleges that the County’s process is
16 clear. What is your opinion about the clarity of the County’s process?

17
18 A I can only speak to what is written. And that is not clear to me. The KCC provisions for
19 wind farm overlay permit applications and subsequent procedures leading towards
20 adoption of the Comprehensive Plan and zoning overlay as well as the specific approval
21 of the development agreement and the rest of the package are confusing.

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25 EXHIBIT 41 R (RW-R)-12
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1 Q Have you ever seen an application rejected during completeness review based upon a
2 dispute over the content of a cover letter which attempts to capture the applicant's
3 understanding of a permit process?
4

5 A No, never.
6

7 Q Please comment regarding the reasonableness and legal sufficiency of a development
8 permitting ordinance which puts a permit applicant at risk of appeals to both the Growth
9 Management Hearings Board (for plan and zoning amendments) as well as Superior
10 Court (in a Land Use Petition Act (LUPA) proceeding).
11

12 Q I can't speak to "legal sufficiency", but it certainly should be the responsibility of the
13 local government jurisdiction to ensure that all of its adopted procedures, regulations and
14 standards for adopting comprehensive plan and land use code amendments, and for
15 granting approvals of permits based on the adopted plan and code are in compliance with
16 the GMA and other relevant statutes and therefore not subject to appeals. Consequently,
17 a process that could encourage or require appeals of the plan and zoning components of a
18 permit process while requiring an appeal of the permit decision through the Land Use
19 Petition Act does not further the intent of sound, predictable permitting process.
20

21 Q Is it true that the Regulatory Reform Act is intended in part to eliminate multiple appeals?
22

23 A At least at the local level, the Act clearly addressed the former problems created by
24 multiple appeals. "Except for the appeal of a determination of significance as provided in
25

1 RCW 43.21C.075, if a local government elects to provide an appeal of its threshold
2 determination or project permit decisions, the local government shall provide for no more
3 than one consolidated open record hearing on such appeal. The local government need
4 not provide for any further appeal and may provide an appeal for some but not all project
5 permit decisions. If an appeal is provided after the open record hearing, it shall be a
6 closed record appeal before a single decision-making body or officer.” (RCW
7 36.70B.060(6).
8

9 Q Have you ever heard of the term “FEIS Functional Equivalent”?

10
11 A No. This is a puzzling term. It does not appear in any SEPA rules or guidance with
12 which I am familiar. Certainly, SEPA is intended to give project proponents and
13 responsible officials a wide range of methods, formats, and approaches to conducting
14 environmental review. In the case of subarea planning, frequently the plan and SEPA
15 documents are combined. This reduces redundancies and also helps to wed the planning
16 and environmental review processes to be more efficient and to better integrate the public
17 participation process. However, once the determination to produce an EIS is made, the
18 environmental review takes on a prescribed structure (Scoping, DEIS, public review,
19 FEIS). To have a “functional equivalent” to an FEIS, implies that there is also a
20 “functional equivalent” to SEPA scoping, a “functional equivalent” to a DEIS, and a
21 “functional equivalent” to a public review and comment period.
22

23 Q Throughout the testimony of Clay White and particularly in Pages 48-50, the County
24 alleges a distinction between a conditional use permit process and the process the County
25

EXHIBIT 41 R (RW-R)-14
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1 adopted to site wind farms. What are the substantive similarities between these two
2 processes?

3
4 A Chapter 17.60 KCC is the current adopted County code provision for conditional use
5 approvals. It establishes a procedure involving 1) submittal of an application “upon
6 forms prescribed for that purpose”; 2) and action by the board of adjustment to approve
7 when the review criteria standards have been met. The standards are that the proposed
8 use is “is essential or desirable to the public convenience and not detrimental or injurious
9 to the public health, peace or safety or to the character of the surrounding neighborhood”
10 and “will not be unreasonably detrimental to the economic welfare of the county and that
11 it will not create excessive public cost for facilities and services by finding that (1) it will
12 be adequately serviced by existing facilities . . . or (2) that the applicant shall provide
13 such facilities or (3) demonstrate that the proposed use will be of sufficient economic
14 benefit to offset additional public costs or economic detriment”. The Board of
15 Adjustment may attach conditions of approval based on its review.

16
17 The above process is very similar to the wind farm overlay process in the sense that there
18 is an application and that a decision-making body (BOCC) has the authority to review the
19 application, determine if the proposal is consistent with county policies, regulations, and
20 standards, and render a decision which may involve adding conditions of approval. The
21 primary difference here is the added complexity of the County’s wind farm approval
22 process also involving comprehensive plan and zoning map amendments and approving a
23 development agreement all together. The application of these highly discretionary
24 criteria in the context of a process which combines legislative action (subarea planning

1 and zoning) with site-specific permitting invites arbitrary decision-making and puts the
2 community at risk of other due process violations, including “appearance of fairness”
3 violations. It invites pre-determinations of the outcome of permitting decisions, with few
4 remedies for applicants to challenges these decisions.

5
6 Q What are the problems related to the process the County adopted?

7
8 A Other than creating confusion between the permitting agency technical staff and the
9 applicant, this also has the potential of creating even more confusion within the decision-
10 making body(ies) and with the public. How is the community within the subarea to
11 absorb information and react effectively if the jurisdiction and applicant are negotiating
12 the terms and conditions of the development agreement and mitigation when at the same
13 time, the planning staff is seeking input regarding goals and objectives at a much higher
14 level than the site-specific project?

15
16 Q In the testimony of Clay White the County alleges a distinction regarding land use
17 between a gas turbine power plant sited in an industrial district and siting a wind farm in
18 Agriculture-20, and Forest and Range zoning districts. What is your opinion regarding
19 the land use compatibility of these uses in the respective zoning districts?

20
21 A It seems to me that the salient comparisons here are that 1) gas turbine power plants are
22 conditional uses in Walla Walla County. While wind farms are not technically
23 conditional uses in Kittitas County as described above, and aside from the potentially
24 conflicting legislative discretion related to reviewing what should be permit applications,

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EXHIBIT 41 R (RW-R)-16
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1 the County's permitting criteria for enabling wind farms is really similar to that typically
2 used to grant conditional use permits aside from the wide discretion inherent in the
3 overlay plan amendment and zoning process; and 2) while the Kittitas project would be
4 arrayed over a 5,000+ acre area, the actual footprint area of the cumulative development
5 would be much smaller, and consequently, the impact in the form of structures,
6 pavement, and other development features likely would not be fundamentally different
7 from those at Wallula.

8
9 It appears that most of the literature pertaining to wind farms is consistent in describing
10 them as rural uses. It is clear that the nature of this technology does not adapt at all to
11 urban conditions, since wind farms require large open spaces to array the turbines.
12 Therefore, it seems unnecessary to engage rural communities in a single-purpose subarea
13 planning process to address the siting of wind farms, when a much more abbreviated
14 process (like a conventional conditional use process) would serve the same end. Since the
15 wind farm would not supplant the underlying rural/agricultural uses that now exist, the
16 rural character and nature of the area would remain as it is. A wind farm is not a
17 conversion of agricultural land to an "industrial" use. This is even more logical when a
18 majority of the stakeholders in the area have signed agreements in support of the project.

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25 EXHIBIT 41 R (RW-R)-17
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