

Ordinance 990

HJ
7/5/22

An ordinance adding a Chapter titled 27.11 County Forestry requirements for Conversion from Forestry to Non-Forestry Use, 6 year Development Moratoriums of harvested areas retained in forestry use, and Conversion Option Harvest Plans

BE IT ORDAINED BY THE BOARD OF CLALLAM COUNTY COMMISSIONERS:

Section 27.11.100, Introduction, is added to read as follows:

Timber management is regulated under the Forest Practices Act (RCW 76.09), which was enacted by the state legislature in 1974 to protect public resources while maintaining a viable forest products industry. Soon after, the Forest Practices Rules (FPR), Title 222 of the Washington Administrative Code (WAC), was developed to implement the objectives in the Forest Practices Act.

Since 1974, the state Department of Natural Resources (DNR) has regulated timber management and the harvest of merchantable timber through the FPR based on the type of Forest Practice Application (FPA) or "class."

In general, the harvesting of trees from parcels over 2 acres in size are subject to a Forest Practice Application (FPA) from the WA State Department of Natural Resources regardless of the zoning district or if the parcel is enrolled in a timber taxing program. A FPA is required for the removal of 5,000 board feet or more of merchantable timber. This is the equivalent of approximately one standard log truck load of logs. DNR manages long-term forest lands, which are typically exempt from local government regulations, but would be subject to a 6 year development moratorium and reforestation requirements.

In 1997, the Forest Practice Act was amended to give local government the authority to regulate forest lands that have a likelihood of converting to uses incompatible with growing trees (including the placement of a single family residence and appurtenances). This provides local jurisdictions the ability to ensure that their code requirements are met for areas that transition from forestry to non-forestry uses.

This ordinance provides procedures and additional options for the transition from forestry to non-forestry use. This includes establishing the process to lift the 6 year development moratorium, and provides standards for a Conversion Option Harvest Plan (COHP), which is a plan voluntarily developed by the landowner and reviewed by the county. Once approved by the county, COHP creates enforceable rights and obligations, including additional options for the issuance of development permits within 6 years of timber harvest.

Section 27.11.200, Definitions, is added to read as follows:

Except as provided for in this section, this chapter will use existing definitions contained in the Washington State Forest Practices Act (RCW 76.09.020), the Washington State Forest Practices Act Rules (WAC 222-16), and the Clallam County Code.

(1) "Conversion from Forestry Use/Timber Management" or "Conversion" means any timber harvest requiring a Class IV General Forest Practice Application (FPA) from the WA State Department of Natural Resources as defined by RCW 76.09.050. This refers to the cutting and removal of trees for the purpose of converting forest land to a use incompatible with forestry use or commercial timber management. Reforestation (per WAC 222-34) may not be required for these conversions. This term does not include COHP.

(2) "Conversion Option Harvest Plan (COHP)" means a plan voluntarily developed by the landowner and approved by Clallam County, indicating the limits and types of harvest areas, size and

type of trees to be retained, road locations, critical area buffers, and details including the location of the non-forest related uses, if known. A COHP, when submitted to the Department of Natural Resources as part of the forest practice application and followed by the landowner, maintains the landowner's option to convert to a use other than forest product production (releases the landowner from the six-year moratorium on future development).

(3) "Development moratorium" means a temporary prohibition by Clallam County of any and all applications for uses incompatible with forestry use for a period of time established in RCW 76.09.460. The development moratorium is 6 years outside of Urban Growth Areas, and 10 years within UGAs from when the FPA was required or obtained.

(4) "Continued Forestry Use/Commercial Timber Management" refers to the cutting and removal of trees, requiring a Class II, Class III and Class IV special Forest Practice Application (FPA) from the WA State Department of Natural Resources (as defined by RCW 76.09.050 & WAC 222-16-050), where the harvested areas are retained in timber management, required to meet WAC 222-34 reforestation requirements, and may be subject to a development moratorium.

Section 27.11.300, Forest Practices – General Regulations, is added to read as follows:

(1) **Applicability.** Forest Practices (including road construction) subject to Chapter 76.09 RCW, the Washington State Forest Practices Act and its implementing regulations at WAC Title 222 conducted within all land use districts shall be subject to the provisions of this chapter. However, only Conversions, Lifting Development Moratoriums, & COHP, which are addressed in Sections 27.11.400, 500, & 700 below, are subject to a Forestry Permit from Clallam County. Forest Practices may also subject to the 2021 Clallam County Shoreline Master Plan, Critical Areas Code, and other Clallam County Codes. Outside of shoreline and critical area, the cutting of less than 5,000 board feet per year is not subject to this Ordinance.

(2) **Application requirements for Clallam County Forestry Permits.** An application for Type 1 & 2 Forestry Permits including Conversions, lifting development moratoriums, and COHP shall be submitted to DCD for review and approval on a form to be determined by the DCD Administrator (administrator). The application shall include:

(a) The application checklist, including a legal description of the property;

(b) The signature of the landowner of the property giving consent of the processing of the permit.

(c) A written narrative specifying the proposed timber harvest addressing each applicable standard of this section and other applicable Clallam County Codes (such as Shorelines, and Critical Areas)

(d) A description and map describing legal access to the property.

(e) Written authorization from the property owner agreeing to permit Clallam County to access the property to ensure compliance with the non-forestry-related conditions of the Forestry Permit issued by the DNR.

(f) The application fees are outlined in the Clallam County DCD Planning Division Fee Schedule.

(3) **Site Plan requirements for Clallam County Forestry Permits.** The following shall be depicted either in required narrative above and/or on the site plan detailing the following (as applicable):

(a) Location of existing and proposed roads, yarding areas, and access points;

(b) The general description of the topography of the entire site (including slope direction and percent slope);

(c) General location of dominant plant type (i.e. trees, shrubs, grassland);

(d) A general description of the variety of tree species present on the site. This should include the size, age and general location.

- (e) General location and type of soils;
- (f) Location and type of water bodies, drainage ways, or wetlands;
- (g) Location and type of Shoreline and Critical Areas;
- (h) Shoreline and Critical Area Buffers where trees/vegetation will be retained
- (i) How the proposal complies with all of the requirements of the Clallam County Shoreline Master Plan, Critical Areas Code, and other applicable Clallam County Codes
- (j) Areas where trees/vegetation will be retained including snags
- (k) Approximate limits of harvest area;
- (l) General location & intended non forestry use(s), if known;
- (m) Areas to be reforested
- (n) Location and areas of desired timber to harvest along with desired harvest technique.

This includes selective (species) harvest, partial/thinning cut, clear cuts/even aged harvest, trees to be retained (leave trees) or other (please describe); and

- (o) Parcel boundaries and dimensions;

(4) **Criteria for County Forestry Permits.** County Forestry Permits are reviewed by the DCD administrator and shall approve, approve with conditions, or deny the application based on consistency with the following criteria:

- (a) The applicable standards of this title;
- (b) The Comprehensive Plan, CCC Title 31;
- (c) The Zoning Code, CCC Title 33;
- (d) The Shoreline Master Program, Title 35;
- (e) The Environmental Policy Code, Title 27.01;
- (f) The Critical Areas Code, Title 27.12;
- (g) The Stormwater Ordinance, Title 27.14
- (h) The Consolidated Permit Process Code, Title 26.10;
- (i) The public health, safety, welfare, use and interest.
- (j) The proposed action is consistent with land uses within the zoning district in which it is located and in the vicinity of the subject property.

(k) Forest Practices Law found in RCW 76.09 and as implemented through the Forest Practice Act (WAC 222)

(5) **Emergency Conditions.** No prior notification or application shall be required for emergency forest practices necessitated by and commenced during or immediately after fire, windstorm, earthquake, structural failure or other catastrophic event. Within 48 hours after commencement of such practice the operator shall submit an application or notification to the DNR with an explanation why emergency action was necessary so that the DNR may evaluate the appropriateness of the “emergency” and of the actions taken. Such emergency forest practices are subject to Chapter 76.09 RCW, WAC Title 222, and county authorities derived from them (including the requirements of this code); provided, that the operator:

(a) May take any reasonable action to minimize damage to forest lands, timber or public resources from the direct or indirect effects of the catastrophic event; and

(b) Shall comply with any requirements of a notice to comply or stop work order as if the operations were conducted pursuant to an approved application. (RCW 76.09.060(7); WAC 222-20-070.)

(6) **Harvesting Timber without a Permit.** When harvesting takes place without a permit, except as provided in subsection (5) of this section, the county may impose the six-year moratorium of subsection 27.11.500(1) of this section from the date the unpermitted harvesting was discovered by the DNR or the county. If the land is converted to non-forestry use, this also constitutes an illegal conversion that is subject to the enforcement provisions of subsections 27.11.600(iii) of this section. (RCW 76.09.060(3)(b)(i)(C) and (c).)

Section 27.11.400, Conversion from Forestry Use to Non-Forestry Use, is added to read as follows:

(1) **Purpose.** A Class IV General Forest Practice Application involves the conversion of forested lands to non-forestry uses, or forest operations being conducted on lands with a high likelihood for conversion to non-forestry use, such as in designated urban growth areas.

(2) **SEPA Required.** (With the exception of a Class I FPA within an Urban Growth Area), Conversions (implement through a Class IV General Forest Practice Application) shall require SEPA environmental checklist per RCW 43.21C.037. The County will take the lead for the SEPA Threshold Determination when it is necessary to ensure that Clallam County Codes area met. DCD may require Class IV General FPA to meet the Type 2 COHP standards (to the extent feasible) through the claiming of the SEPA Lead, and the issuance of a threshold determination. The purpose of this is to ensure compliance with Clallam County Codes and to mitigate significant impacts from conversions.

(3) **Higher Level of Review.** Environmental review and conditioning of Class IV General forest practice applications is intended to be at a higher level than for continuance of forestry use, or a timber harvest meeting the COHP standards. The conversion of forested lands to non-forestry uses also entails the transition of the subject lands from being exempt from critical areas to being subject to the critical areas and other requirements of the Clallam County Codes (CCC).

(4) **Applicability.** Applications involving any of the following circumstances are considered Class IV General:

- (a) Lands that have been or are being converted to non-forestry use;
- (b) Forested land on parcels that are 2 acres or smaller in size within an Urban Growth Area;
- (c) Lands with a likelihood of future conversion to urban development within the next 10 years; and
- (d) Forest practices that would otherwise be Class III, but are taking place on lands that are not to be reforested because of the likelihood of future conversion to urban development (WAC 222-16-060 & 222-34-050).

(e) All Class I, Class II (including timber harvest and road construction) Class III, and IV-Special forest practice applications in any designated unincorporated urban growth area.

(5) **Continuing Forestry in Urban Growth Areas.** Forest practices within a designated UGA require a Class IV General permit unless:

- (a) The landowner submits a signed statement of intent not to convert for 10 years, with an application, accompanied by either a written forest management plan acceptable to the DNR or documentation that the land is enrolled under the provisions of Chapter 84.33 RCW (i.e., proof of forest tax class status). A mandatory development moratorium shall be applied (see subsection 27.11.500(1) of this section); or
- (b) A COHP approved by Clallam County is submitted to the DNR as part of an application.

Section 27.11.500, Regulations Governing Continuance of Forestry Use, is added to read as follows:

(1) **Mandatory Six-Year Development Moratorium.** The cutting and removal of trees through a Class II, Class III and Class IV special forest practices (as defined by RCW 76.09.050 & WAC 222-16-050), where the Forest Practice Application (FPA) indicates that the harvested areas is retained in forestry use/commercial timber management, will be subject a development moratorium imposed under WAC 222-20-050(3) and RCW 76.09.060(3)(d). For a period of six years from the date the DNR Forest Practice Application was approved and/or timber harvested, the county shall deny all applications for uses incompatible with growing trees, including but not be limited to building permits, septic system permits, subdivision approvals of areas subject to the application. (RCW 76.09.060(3)(b)(i),(ii), and (iii).

(2) **Exceptions to Development Moratorium.** The following are not subject to a Development Moratorium:

- (a) A Class IV General FPA
- (b) A COHP approved by Clallam County, provided that the provisions of the COHP are implemented through the FPA issued by DNR.
- (c) Approved Class II, III or IV Special FPA applications that have either been withdrawn or expired, and no harvest in reliance upon such approval has taken place.
- (d) Areas where no timber was harvested under the FPA
- (e) Expansions, alterations, or maintenance of existing structures or the construction of accessory structures within developed areas (i.e. area not in forestry use as documented by current use or taxing program.)
- (f) Land Divisions/Boundary line adjustments done for purposes of conservation of open space/natural areas or on portions of the property where no timber harvest occurred.

(3) **Release of Moratorium.**

(a) **Process & Notice.** A property owner can wait until the required time period expires for the moratorium or apply to have the development moratorium released.

(i) The administrator may “release” the development moratorium for the construction of one single-family residence and related accessory buildings on a legal lot and building site subject to a Type I review.

(ii) A release from a development moratorium, other than a single-family residence and related accessory buildings shall be subject to a Type II procedure.

(iii) Prior to taking action on a request for release, and following the Type I or Type II procedure, the administrator provide notice as provided by Section 26.10.410 CCC. This shall include soliciting comments from adjacent owners (per Section 26.10.410(2)(a),(b)&(c) CCC); appropriate federal/state departments, and tribal governments.

(b) **Criteria for release of moratorium.** A release of development moratorium through a Type I or II process (see above) is subject to the following findings:

(i) The person requesting the release did not attempt to avoid the county review or restrictions of a conversion forest practices application, which may be demonstrated by a transfer of property;

(ii) Environmentally sensitive areas and their buffers, and shoreline area as set forth in this code and the Shoreline Master Program were not damaged in the forest practice operation, or that any such damage is repairable with restoration; and

(iii) Corrective action can be undertaken to provide for compliance with applicable conversion standards established by this section which shall include the preparation of the applicable report to address the critical area impacted per Sections 27.12.800 to 865 CCC. This shall at a minimum ensure the restoration of major development buffers (specified in Chapter 27.12 CCC). Another option would be to obtain critical area permits (per Sections 27.12.700 to 740 CCC) that the proposal would have been required subject to meet since this activity is no longer exempt from the critical areas review under CCC 27.12.035(10). If the timber harvest has already impacted the critical areas, the required review of the critical areas permits shall be reviewed as if the timber harvest has not occurred and the critical areas were in their pre-harvest condition.

(iv) The harvest of trees through a Class II, or III, or IV Special FPA did not undermine the County’s ability to efficiently ensure the transition from forestry to non-forestry use. The removal of trees shall be coordinated with the likely subsequent use of the property (i.e. require landscaping buffers/screening between uses).

Section 27.11.600, Illegal Conversions, and Enforcement, is added to read as follows:

(1) Conversion without a Class IV General Permit or COHP.

(a) If land is converted to a use incompatible with growing trees within six years after approval of a forest practices permit application that was not a Class IV General or did not have an approved COHP, the conversion constitutes a violation of each of the local and regional authorities to which the forest practice operations would have been subject if the application had stated that conversion was intended. (RCW 76.09.060(3)(b)(iii).)

(b) The county shall impose the six-year moratorium of Section 27.11.500(1) of this section from the date the unpermitted conversion was discovered by the DNR or the county. (RCW 76.09.060(3)(b)(i)(C).)

(c) Violations may be subject to civil or criminal penalties, as per Chapter 222-46 WAC. The county may also enforce its regulations as provided in subsection (1)(a) of this section, using the procedures in Sections 33.59 and 27.12.055 CCC.

(2) Failure to Comply with Reforestation Requirements.

(a) It is the responsibility of DNR to ensure that reforestation WAC 222-34 occurs on lands devoted to continued forestry use (per 27.11.500 of this chapter). However, if reforestation does not occur within these areas or on areas required under the county forest permit requirements, the county may also enforce its regulations as provided in subsections (1) of this section.

(b) Failure to reforest may also constitute a removal of forest tax designation and a change of use, and shall subject the lands to the payments and/or penalties resulting from such removals or changes. (RCW 76.09.060(3)(b)(ii).)

Section 27.11.700, Conversion Option Harvest Plan, is added to read as follows:

(1) Purpose of COHP.

(a) A COHP provides landowners an option to plan for and manage forested areas to promote the health and diversity of the forest and to allow for some future non-forestry development. A COHP is a plan voluntarily developed by the landowner and reviewed by the county. An approved COHP provides landowners the option to thin or patch cut forested areas to promote the health of the stand, allow road improvements to be made to serve the timber harvest and future uses, clear trees from anticipated development areas or to provide view corridors, while maintaining the option to obtain non-forestry related permits. A properly implemented COHP maintains wildlife diversity by maintaining and improving a diverse mix of trees, understory and herbaceous ground cover. A COHP requires minimizing the disturbance of the forest duff layer and understory which will help minimize wind and water erosion while maintaining the natural infiltration rate of the area. By minimizing disturbed areas this may avoid the need for costly temporary erosion and sediment control and drainage permits as part of the COHP. These stormwater permits would be reviewed through future development permits, which may include stump removal, clearing and grading. Any harvest of trees shall be done accordance with the approved plans. Currently, the approved plan will be submitted to the DNR as part of a Class II, Class III or Class IV special forest practice application and will be attached to and become part of the conditions of the permit approved by the DNR. A Type 1 or Type 2 COHP will require a Type I Permit from DCD.

(b) If the requirements of the COHP are continuously met by the landowner, the COHP maintains the landowner's option to convert to non-forestry use (i.e. a use incompatible with growing trees); that is, it releases the landowner from the six-year moratorium on future development (see subsection 27.11.500(1) of this section) without having to file a Class IV General FPA. (WAC 222-20-050(2). Failure to meet the requirements of the COHP requires the imposition of the six-year moratorium, and conversions under such circumstances are illegal conversions; see subsection 27.11.600 of this section.

(2) **SEPA Requirements for COHP.** COHP implemented through a Class II or III FPA by DNR are exempt from requiring a SEPA environmental checklist per RCW 43.21C.037, when developments permits are not proposed within three years of the date of the timber harvest requiring a FPA from DNR.

If development permits are proposed within 3 years of the date of the timber harvest requiring a FPA from DNR, the county will issue a SEPA Threshold Determination as part of the processing of the COHP.

(3) **Type 1 COHP Standards.** All COHP that meet the following minimum standards shall be subject to a Type 1 review:

(a) No more than 33 percent of the number of standing trees and trees 12 to 20 inches diameter-at-breast-height (dbh) east of the Elwha River or trees 18 to 30 inches dbh west of the Elwha River may be harvested under a COHP. As an alternative within a uniform timber stand 33 percent of the timbered area (patch cut) may be harvested. With the exception of required roads, all stumps and understory shall remain undisturbed. No brush raking is permitted.

(b) Unless DCD determines buffers are not needed to protect aesthetics of the area, to ensure compatibility with adjoining uses, or to address potential hazard trees within 150 feet of structures, a 50-foot-wide buffer shall be preserved along public and private roads, and property lines abutting non resource lands. When required, no more than 33 percent of the total number of standing trees and trees 12-20 inches dbh east of the Elwha River or 18 to 30 inches dbh west of the Elwha River may be removed within the buffer.

(c) All roads in a COHP shall be designed to accommodate the potential for future development and subdivision of the property. Roads and skid trails shall minimize total road length. All roads in a COHP intended to serve future land divisions shall meet the design and construction standards specified in Chapter 29.30.200 CCC. All roads which propose to cross a stream shall be required to obtain an hydraulic project approval (HPA) permit, as determined by the Washington Department of Fish and Wildlife, or a Forest Practice Hydraulic Project from the Washington State Department of Natural Resources prior to submittal of the COHP.

(d) A COHP shall minimize the number and size of clearcut areas. With the exception of a patch cut, no individual clearcut areas may exceed 20 percent of the total acreage, up to a maximum of two acres. The future removal of stumps, clearing of duff/understory, or grading or clearing will require compliance with the Clallam County Shoreline Master Plan, Critical Area Code, Stormwater Ordinance, and other Clallam County Codes.

(e) The proposed timber harvest or road construction is not located within an area designated as Geologically Hazardous per Section 27.12.410 CCC.

(f) With the exception of the proposed conversion area (i.e. building location), all trees over 100 years old or over 20 inch dbh east of the Elwha River or 30 inches west of the Elwha River, and snags (excluding diseased trees) shall be retained where they do not pose a safety hazard.

(g) Trees remaining on the site after the harvest will represent all species and size classes existing on the site before harvest, unless it is determined by DCD with consultation from DNR & WDFW that the removal of all of a specific tree would promote the health of the forest stand. Examples of this include removing a species of trees with a disease (like Douglas fir with laminated root rot) or a stand of alder that has met its full potential tree height. If these areas are not intended to be utilized for non-forest uses they shall be reforested at 300 to 400 trees per acre meeting the requirements found in WAC 222-34. Areas requiring reforestations should include a variety of native tree species to Clallam County, provides diverse forestlands/bio-diversity, and are appropriate the on-site conditions/constraints.

(h) Trees remaining on the site will be of sufficient quality (good crown cover, straight trunks, deep root system, and healthy condition) to survive after the harvest is complete.

(i) All required buffers shall be flagged and approved prior to harvesting.

(j) No portion of the proposed harvest is classified as designated forest land or is located within a forest resource land use district;

(k) Removal of herbaceous species which interfere with growth of the desired trees shall require the submittal of a herbaceous/weed management plan to the Clallam County DCD or Noxious Weed Department for review and approval. This plan should include Integrated Pest Management, and specify the methods to control herbaceous species such as flaming, digging, cutting and spot chemical applications, and chemicals to be used. The plan should also address the importance of preserving the native plants (that do not hinder tree growth) and removing noxious weeds and invasive non-native plants such as Armenian (Himalayan) Blackberries and ivy from the harvested areas. This plan should utilize methods that are effective, least toxic, and minimize the impacts to the environment. The requirements of this plan shall be in effect until areas are reforested or the subsequent use is established.

(4) Type 2 COHP Standards. Exceeding the standards stated in Section (3) above shall be subject to a Type 2 Forestry Permit from DCD. A Type 2 COHP shall meet the Standards of Section 3 above to the greatest extent feasible, except that the following thresholds shall not be exceeded:

(a) No timber or road construction shall occur within geologically hazardous areas unless the applicant can demonstrate that the proposed activity will not adversely impact the geologically hazardous area. This may include submitting a geotechnical report meeting requirements of Section 27.12.820 CCC to DCD for review and approval.

(b) A maximum of 66 percent of the number of standing trees and trees 12-20 inches diameter-at-breast-height (dbh) east of the Elwha River or 18 to 30 inches dbh west of the Elwha River may be harvested under a COHP. As an alternative within a uniform timber stand 66 percent of the timbered area (patch cut) may be harvested. Another option is to retain a minimum of 100 well distributed trees per acres, which represent the largest size and class trees shall be retained on-site. DCD would allow the COHP harvest that retains more large trees, provides diverse forestlands/bio-diversity, and are appropriate the on-site conditions/constraints of the site.

(c) With the exception of a patch cut, a maximum of 50 percent of the total acreage may be clear-cut. The future removal of stumps, clearing of duff/understory, or grading or clearing will require compliance with the Clallam County Shoreline Master Plan, Critical Area Code, Stormwater Ordinance, and other Clallam County Codes.

(d) DCD may require a Forest Management Plan for the Clallam County Assessor's Designated Forest Land Taxing classification, a forester to mark the clear cut, buffers and leave trees, or a Small Forest Owners plan from DNR to ensure compliance with the Type 2 COHP standards.

(e) Timber harvests exceeding these thresholds will require a Class IV General FPA from DNR and will be subject to provisions of Section 27.11.400 of this Chapter.

(5) Implementation of COHP. Typically, DNR reviews and takes action on all FPA that have approved COHPs attached within 30 days from the date of a complete application. Failure of the DNR to take action within 30 days results in the COHP plan being approved as submitted. All COHP harvest activities shall be completed within three years from the date the COHP forest practice permit is issued by the DNR.

(a) Failure to Comply with the Terms of a COHP.

(i) An approved COHP may not be altered or revoked by the permittee without written agreement by the administrator, or by the county without agreement by the permittee, and in either case must be approved by the DNR.

(ii) If a landowner fails to comply with the requirements of the conversion option harvest plan, the county shall impose the six-year moratorium of subsection 27.11.500(1) of this section from the date the application for the permit was given final approval by the DNR. (RCW 76.09.060(3)(b)(i)(F).)

(iii) If a landowner fails to comply with the requirements of the conversion option harvest plan, any conversion that occurs constitutes an illegal conversion that is subject to the enforcement provisions of subsections 27.11.600(1)(b)&(c) of this section.

(b) Improvements Subject to this Code. If any off-site or on-site improvements are subject to development standards or permit requirements of this code, such requirements shall be met before a COHP approval is granted by the county.

ADOPTED this 5 day of July 2022

BOARD OF CLALLAM COUNTY COMMISSIONERS

[Signature]
Mark Ozias, Chair

[Signature]
Randy Johnson

[Signature]
Bill Peach

ATTEST:

[Signature]
Loni Gores, CMC
Clerk of the Board

