

STATE OF CALIFORNIA
STATE WATER RESOURCES CONTROL BOARD

In the Matter of the Petition of
Project Alpha to Review Order
No. 74-64 of the California Regional
Water Quality Control Board, Santa
Ana Region

Order No. WQ-16

BY THE BOARD:

On January 17, 1974, the State Water Resources Control Board (State Board) remanded the petition of Project Alpha (petitioner) for review of Order No. 73-37 of the California Regional Water Quality Control Board, Santa Ana Region (Regional Board) to the Regional Board for rehearing.

Order No. 73-37, which was adopted by the Regional Board on June 29, 1973, prohibited the discharge of waste by petitioner at a Class I disposal site located near Corona, Riverside County. The State Board remanded the petition for review after finding that the action of the Regional Board in adopting Order No. 73-37 was inappropriate and improper because of its failure to explain the reasons for the order and the factual basis for them.

On March 22, 1974, after a rehearing of petitioner's request for adoption of an order prescribing waste discharge requirements for the Class I disposal site, which was held on March 1, 1974, the Regional Board adopted Order No. 74-64 which prohibited the discharge of waste by the petitioner at the proposed Class I disposal site. On April 19, 1974, petitioner filed its petition with the State Board requesting review of Order No. 74-64.

Petitioner specifically requests that the State Board vacate and rescind Order No. 74-64 and adopt an order incorporating the Regional Board's staff recommendations prescribing waste discharge requirements for the site.

Petitioner advances nine specific contentions in support of its allegation that the Regional Board's action was inappropriate and improper, all of which are hereafter considered. After review of the record of the Regional Board, and after considering the contentions of petitioner, we have determined that the action of the Regional Board in adopting Order No. 74-64 was appropriate and proper.

I. BACKGROUND AND SITE LOCATION

The petitioner proposed to develop a Class I and Class II disposal site to be situated at the northeastern end of the Santa Ana mountains, approximately two miles west of the City of Corona and about a mile south of the Riverside freeway. Ingress and egress to the site is through a proposed improved access road from the northeast.

The disposal site consists of a series of steep-sided hills and narrow canyons draining in a northeasterly direction to Wardlow Wash. Two main canyons, known as "East Canyon" and "West Canyon", converge in a wishbone configuration just inside petitioner's north property line. These two main canyons join just south of a high northwest trending ridge, thus isolating the disposal area from the City of Corona and State Highway 91.

The site would have separate areas for Group 1 and Group 2 wastes in accord with a long-range plan for ultimate use

of the area. However, the recommended tentative requirements provided for the operation of only a Class I site in the "West Canyon" portion of the site. The Group 1 wastes are proposed to be disposed of by evaporation ponds of approximately 1.13 surface acres. Proposed earthen dikes constructed across West Canyon would form the ponding areas for the Group 1 wastes.

Although numerous public agencies, including the Orange County Flood Control District, Orange County Water Pollution Department, Riverside County Waste Disposal Engineer and others, have given their approval to the proposed project, the proposal has generated active opposition by local citizens groups, the City of Corona, Riverside County Department of Public Health and the Western Municipal Water District.

At the conclusion of both hearings which were held by the Regional Board, the Regional Board staff recommended approval of the West Canyon portion of the site as a Class I disposal site, subject to appropriate waste discharge requirements and conditioned upon extensive construction of the facility as proposed by the petitioner, and recommended that no discharge of Group 1 or Group 2 wastes be allowed in the East Canyon.

Order No. 74-64 prohibits the discharge of waste as proposed by Project Alpha and contains, in part, the following findings:

- "6. The disposal site does not meet the criteria contained in the California Administrative Code, Title 23, Chapter 3, Subchapter 15 for a solid waste disposal site because:
- a. Inundation of the disposal site could occur due to landslides generated from ground accelerations due to earthquakes from active faults located within one mile of the disposal sites. The inundation could occur due to the subsequent failure of storm water diversion facilities or because of the sudden introduction of large volumes of earthen materials.
 - b. The proposed method of operations may cause disposal ponds to be washed out due to the addition of rainfall directly onto the disposal area by a maximum intensity storm or as the result of ground accelerations due to earthquakes from nearby active faults causing material to overflow man-made barriers.
- "7. Usable water supplies and a major conduit supplying water to 3,000,000 people by the Metropolitan Water District of Southern California are located within the zone of hazard should materials or contaminated leachate escape from the site.
- "8. Conditions could occur which create the unacceptable risk for operations of a Class I disposal site in the proposed location:
- a. Earthquake of such magnitude which could cause failure of containment facilities.
 - b. Stormwater generated in the watershed could cause floods of such magnitude to wash out the toxic materials in the site.
 - c. The capacity of the site is limited and could not be used over the anticipated lifetime creating a threat of loss due to future inundation.
 - d. Loss of toxic materials which might escape the site cannot be economically or practically cleaned up or removed from the environment."

The findings, and the evidence in support thereof, will be discussed in detail below.

II. SITE HYDROLOGY

Hydrological conditions in the area indicate only small pockets of groundwater are present in the West Canyon. No water wells have been noted in the sedimentary rock. No springs or seeps are located in the area and there are no bodies of water in the immediate vicinity.

III. SITE GEOLOGY

Three distinct units of the Ladd Formation occur in the subject area. These consist of an upper sandstone and conglomerate member, a middle shale and silty claystone member, and a lower series of sandstone and conglomerates containing minor interbeds of shale.

The shale and silty claystone member has a surface exposure approximately 850 feet wide in the West Canyon area. The beds grade laterally into a sandy facies in an easterly direction and in the East Canyon area the exposed thickness is reduced to two fingers with a total thickness of about 450 feet.

The shale and silty claystone member is generally very thinly bedded (formed in thin sheets) and argillaceous (clay-like). It is friable (crumbly) to firm and generally, when disturbed, parts along the bedding planes into thin sheets less than one-half inch thick. Occasional thin lenticular sandy and silty streaks are included in the shale unit with the sand becoming more predominant in an easterly direction. The shale and silty claystone are subject to erosion.

The shale and silty claystone appear to be impermeable to the flow of fluids. The permeability, as would be expected, increases with an increase in the percent of sand. Laboratory tests of shale and claystone samples indicated a permeability range of 1.2 to 120×10^{-8} cm/sec, with an average of 42×10^{-8} cm/sec (0.15 in/yr to 15 in/yr with an average of 5.2 in/yr). Isolated thin lenses of sandstone ran as high as 6.5×10^{-5} cm/sec. Two samples of concrete curbing were tested as a comparison. The results of these tests were 30×10^{-8} cm/sec and 2.8×10^{-8} cm/sec.

The geologic structure of the area is steeply dipping (the layers in the rock are nearly vertical), faulted monocline lying between the Whittier Fault to the south and the Chino Fault to the east. The regional strike of the beds varies from north 60° to 80° west, and the beds dip 50° to near vertical in a northeasterly direction. Data from oil wells drilled in the area indicate that these structural conditions persist to depths below 4,000 feet.

The cretaceous shale underlying the property in the West Canyon meets the geological requirements for a Class I site by being naturally capable of preventing vertical and lateral continuity between liquids and gases emanating from waste in the site and usable surface or groundwater. The sandstone and conglomerate underlying the property in the East Canyon are more permeable to the flow of fluids and are saturated with poor quality groundwater a few feet below the surface. The East Canyon is geologically suitable for a Class II site.

IV. CONTENTIONS OF PETITIONER AND FINDINGS

The contentions of the petitioner and our findings relative thereto are as follows:

1. The Regional Board failed to prescribe requirements for the proposed discharge as required by Water Code Sections 13260 and 13263 and in accord with its duty to assist in the establishment of Class I waste disposal sites.

Petitioner contends that the provisions of the Water Code require the Regional Boards to prescribe waste discharge requirements in every case except those instances where discharge requirements absolutely cannot be designed to reasonably protect the State's water from pollution.

In support of this contention the petitioner cites Water Code Sections 13000, 13260, 13263 and others, alleging that the Regional Board has failed to comply with the Porter-Cologne Act.

We do not agree with petitioner's construction of the duties and responsibilities of the Regional Board. The primary consideration of the Regional Board is the regulation of activities and factors which affect water quality in order to attain the highest water quality which is reasonable. (Water Code Section 13000). It is well recognized that the Regional Board must be afforded great latitude and discretion in implementing programs for achieving water quality objectives, and that many factors exist which must be taken into consideration when arriving at a decision as to whether and under what circumstances a discharge of waste may be allowed or prohibited.

There is no vested right to discharge waste, [Water Code Section 13263(g)] and in the exercise of its discretion the Regional Board may prohibit the discharge of waste as authorized by Water Code Section 13243. Factors justifying the prohibition of the discharge of waste in addition to degradation, or threatened degradation, of water quality include the existence or threat of public nuisance, and the necessity to protect against environmental damage, to minimize adverse environmental impacts, or to ensure long-term protection of the environment. (Section 2718, Title 23, California Administrative Code).

We recognize that there is a need for the establishment of appropriate sites for the disposal of Group 1 wastes. If, however, there is substantial evidence that a proposed site does not meet the criteria of a Class I site as provided in Section 2510, Title 23, California Administrative Code, the Regional Board has an affirmative duty to prohibit the disposal of Group 1 wastes at the proposed site.

2. The Regional Board failed to prescribe waste discharge requirements in accord with the evidence presented to it.

Petitioner contends that the evidence presented before the Regional Board establishes that the site is suitable for the discharge of Group 1 and Group 2 wastes and that therefore the Board should have prescribed discharge requirements. In support of its contention, petitioner refers extensively to the testimony of witnesses, both for the proponents and for the opponents of the project, and alleges in conclusion that "a critical examination of all the evidence presented opposing the project can only lead to

the conclusion that there was no credible evidence introduced which was contrary to that of Project Alpha."

After review of the evidence before the Regional Board, and in light of the entire record, we find that although the proposed site meets some of the criteria required for a Class I waste disposal site, or could be modified to achieve that capability in some respects, there is credible and substantial evidence in support of the Regional Board findings that it does not meet all the criteria to qualify as a Class I disposal site and therefore the order is appropriate and proper.

Class I disposal sites are those at which complete protection is provided for all time for the quality of ground and surface waters from all wastes deposited therein and against hazard to public health and wildlife resources. (Section 2510, Title 23, California Administrative Code). In order for a proposed site to qualify it must comply with all of the criteria specified in Section 2510.

A. Evidence supporting establishment of the proposed site.

The record before the Regional Board at both hearings indicates that the proposed site meets the following criteria or with appropriate modifications could be modified to meet the following criteria of Section 2510:

a. Geological conditions are naturally capable of preventing vertical hydraulic continuity between liquids and gases emanating from the waste in the site and usable surfaces or groundwaters.

b. Geological conditions are naturally capable of preventing lateral hydraulic continuity between liquids and gases emanating from wastes in the site and usable surface or groundwaters, or the disposal area can be modified to achieve such capability.

c. Underlying geological formations which contain rock fractures or fissures of questionable permeability are permanently sealed to provide a competent barrier to the movement of liquids or gases from the disposal site to usable waters.

f. Leachate and subsurface flow into the disposal area will be contained within the site unless other disposition is made in accordance with requirements of the Regional Board.

B. Evidence supporting the Regional Board findings and order.

The additional criteria set forth in Section 2510 which must be met before the proposed site could be approved as a Class I disposal site, the findings, and the evidence supporting the findings of the Regional Board are as follows:

d. Inundation of disposal areas will not occur until the site is closed in accordance with requirements of the Regional Board.

e. Disposal areas shall not be subject to washout.

g. Sites shall not be located over zones of active faulting or where other forms of geological changes would impair the competence of natural features or artificial barriers which prevent continuity with usable waters.

h. Sites made suitable for use by man-made physical barriers shall not be located where improper operation or maintenance of such structures could permit the waste, leachate, or gases to contact usable ground or surface water.

The Regional Board found that:

"Inundation of the disposal site could occur due to to landslides generated from ground accelerations due to earthquakes from active faults located within one mile of the disposal sites. The inundation could occur due to the subsequent failure of storm water diversion facilities or because of the sudden introduction of large volumes of earthen materials." (Finding 6a).

"The proposed method of operations may cause disposal ponds to be washed out due to the addition of rainfall directly onto the disposal area by a maximum intensity storm or as the result of ground accelerations due to earthquakes from nearby active faults causing material to overflow man-made barriers." (Finding 6b).

Extensive testimony was adduced before the Regional Board during both hearings concerning the seismic hazards.

Dr. Donald Lamar, an engineering geologist, who was acknowledged by petitioner's expert witnesses as "one of the most knowledgeable individuals in the area regarding this regional problem" testified that although there was not an active fault directly beneath the project site, the Project Alpha site was situated in a V within a mile of both the Elsinore fault and the Chino fault. He added that both faults could be considered active and that the site is within an active fault zone in terms of potential hazard.

(RT March 1, 1974, pg 96, lines 1 through 18). He summarized his report by stating that he suggested alternative locations which were not within a hazardous zone, and that it was theoretically possible that adequate safeguards could be engineered for the facility, but that, in his judgment, the required safeguards would be impractical or prohibitively expensive.

Mr. Alvin Franks, State Board Geologist, corroborated Dr. Lamar's reports and criticized the proponent's geologist's reports as not being complete on landslide hazards which might be generated as a result of earthquakes on data relative to design

factors necessary to prevent slides from coming into the ponds and causing an overflowing of the ponds. Mr. Franks pointed out that the threat of landslides is an established hazard and that, unless the slopes west of the site were stabilized, heavy rains would start the slides moving, block drainage ditches and cause inundation of the ponds.

The evidence was not controverted that in order to modify the slopes around the ponds to prevent landslides due to maximum possible earthquake vibration the removal of as much as several million cubic yards of soil and rock would be required. This would, of course, increase the possibility of erosion due to the removal of natural vegetation.

Additional evidence which was presented during the hearings, including evidence of periodic, intense, short duration rainfall and rapid runoff, raised the question of stability of the sides of the canyon walls. The admitted limited capacity of the site creates further risks that storm water created by flooding could wash out the ponds and inundate the entire site.

Pertinent testimony concerning the potential threat to usable water supplies which might be generated by the escape of toxic wastes from the site was also given by Richard Proctor, Senior Geologist with the Metropolitan Water District. He expressed concern over the safety and security of a major distribution of pipeline located 800 feet downstream of the site which supplies a greater portion of Orange County. He pointed out that in his judgment earthquake shaking could create the serious possibility of contamination to the water supply.

Examination of the record reveals additional persuasive evidence that the proposed site has the serious potential of inundation and failure of containment facilities, and of becoming a public nuisance due to its location within close proximity to a populous and growing neighborhood, potential hazard to wildlife and an adverse effect upon environment. At the same time we do not overlook the fact that the proponent's expert witnesses presented cogent evidence supporting their position. However, we do not believe the proponent has met his burden of proof that the site meets all of the criteria necessary for a Class I disposal site. There is substantial evidence to the contrary, and as we stated above, unless the site meets all of the criteria, the discharge of waste must be prohibited. Specifically we find that the proposed site does not meet the following criteria for a Class I disposal site:

Inundation of disposal areas shall not occur until the site is closed in accordance with requirements of the regional board.

Disposal areas shall not be subject to washout.

Sites shall not be located over zones of active faulting or where other forms of geological change would impair the competence of natural features or artificial barriers which prevent continuity with usable waters.

Sites made suitable for use by man-made physical barriers shall not be located where improper operation or maintenance of such structures could permit the waste, leachate, or gases to contact usable ground or surface water. (Emphasis added.)

In finding there was substantial evidence to support the Regional Board's decision, we do not attempt to assess the credibility of the witnesses. We must, however, thoroughly consider the evidence in support of the Board's decision unless the testimony is inherently improbable or wholly unacceptable to reasonable minds.

After viewing all of the evidence before the Regional Board, we find that petitioner did not controvert the testimony of all adverse witnesses and that not only was there substantial evidence which supported the findings of Order No. 74-64, there was a preponderance of evidence which indicated that the site does not meet the criteria for a Class I disposal site.

3. The Board failed to prescribe discharge requirements in accord with its own staff report and recommendations and interposed its opinion contrary to the opinion of experts.

Petitioner contends that the Regional Board unreasonably and arbitrarily rejected the staff recommendations without any basis for its action. In support of this contention petitioner argues that "where the nature of the decision is so very technical, and where there is no credible evidence contrary to that used by the Staff in forming its recommendations, the Board is ill advised to interpose its own view."

It is well settled that the Regional Board is not obligated to accept as correct the petitioner's self-serving presentations, nor is the Regional Board obligated to accept the advice of its staff or unsupported opinions of other experts. As judges of the credibility of the witnesses' presentation, the Board is at liberty to reject any and all portions

of it, to draw inferences contrary to those suggested therein or to draw such inferences as might be supported by certain portions of the witnesses' testimony and such other factors within the common knowledge or expertise of the Board.

In light of our findings that there is substantial evidence to support the Board's findings and order, petitioner's contention is without merit.

4. The Board made its order prohibiting any waste discharge on a local emotional and political basis having nothing to do with the jurisdictional requirements of the Board's authority.

Petitioner contends that the Regional Board rejected evidence in support of the project, improperly embraced "a purely provincial set of values" and made its decision entirely upon local appeals not to place the site near Corona.

Based upon the record before the Board, it is clear that the Regional Board did not abdicate its responsibility to investigate the proposed project fairly and impartially. Throughout two exhaustive hearings the record reveals extensive questioning by the Regional Board members of witnesses for the staff, the proponents and the opponents of the project. Although the proposed project met with unified opposition from organizations and residents of the Corona area, we find nothing in the record to substantiate petitioner's allegations that the Regional Board yielded to, or was subjected to, undue political pressure.

We note throughout its petition that the petitioner speculatively refers to the state of mind and mental processes

of the Regional Board in arriving at its decision. We cannot, and we do not, attempt to assess the question of how the members arrive at their decision. This question has been thoroughly resolved by the U. S. Supreme Court which holds that it is no more practical to inquire into the mental processes of an administrative judge than it is to probe the mind of a court judge, and the latter is never done. Neither we, nor the courts, will entertain an inquiry as to the extent of the Board's knowledge of the points decided, or as to methods by which they reach their determination. United States v. Morgan, 313 U.S. 409, 422; 61 Sup.Ct. 999; De Cambra v. Rogers, 189 U.S. 119, 122; 21 Sup.Ct. 519, 521.

5. One or more Board members received evidence prior to and outside of said hearing, and failed to reveal said contacts or to disqualify themselves from participation in the decision of the Board.

The petitioner refers to a visit made to the project site prior to the June 29, 1973, hearing, with the petitioner's attorney and further refers to alleged "extensive prehearing contacts and evidence from opponents to the project" involving one member of the Board.

Although the petitioner specifically disavows claim that prejudice resulted from the prehearing visit to the site, the petitioner alleges that the fact that all such contacts were not revealed prevented the hearing from being a fair administrative hearing. In support of this contention the petitioner cites its request for such disclosure at the March 1,

1974, hearing and the adverse ruling by the Chairman which denied its request.

Petitioner has incorrectly stated the issue and facts. An examination of the transcript of the March 1, 1974, hearing (RT pg. 31, lines 16 through 19) reveals that the petitioner asked that the Board members be polled as to their prehearing information and contacts. The motion was made immediately after petitioner's counsel declared that the site had been visited by two members prior to the June 29, 1973, hearing. At the same time he alleged there had been additional contacts between Board members and opponents of the site. Petitioner, however, offered no evidence concerning the alleged contacts, did not cite the source of information and admitted the allegation was based on hearsay. Petitioner's counsel later stated that he was not making a motion for disqualification of members of the Regional Board. (RT pg. 33, lines 19 and 20).

We disapprove of independent individual investigations or visits to proposed sites by Board members and such practices must be discouraged. It is recognized that members of public agencies cannot avoid all contacts with individuals who are, or may become parties to actions which come before the Board. It is equally well known that administrative agencies face many influences, and as the value of their decision to particular interests or groups increases, the likelihood of direct or covert pressures will also increase.

We agree that a fair hearing and due process requires that the Board members evaluate the entire case on the record of the hearing and base their decision only on evidence adduced at

the hearing. To that end, a Board member should disclose those facts or contacts which are within his own knowledge if they are of sufficient import as to interfere with his ability to evaluate the case solely upon the evidence which is presented before the Board.

We find in the instant case that the error, if such existed, created by the Board members' visit to the site was cured by the disclosure by petitioner's counsel of this visit. In any event, the petitioner participated in the visit and will not be heard to complain of his own actions.

Petitioner's additional allegations are untimely and without merit. Petitioner seeks by this petition for review to establish prejudice, bias and grounds for disqualification of Board members which purportedly denied it a fair hearing. This is not supported by the record.

It is well established that a party seeking to disqualify an agency member or hearing officer must make a timely motion supported by affidavits. Grosjean v. Board of Education, 40 Cal.App. 434, 442; 181 P. 113, 116. Failure to file a timely affidavit constitutes a waiver. Kendall v. Board of Osteopathic Examiners, 105 Cal.App.2d 239, 248; 233 P.2d 107, 112. It has also been established that even if a party has reasonable grounds to believe an agency member is biased and prejudiced, but is unable to establish this by affidavit, the hearing officer is justified in refusing to permit an examination of the agency member by voir dire unless governing statutes provide for voir dire. Feist v. Rowe, 3 Cal.App.3d 414; 83 Cal.Rptr. 471.

It should be finally noted that even if the challenged member does not disqualify himself and votes with other members, the decision of the Board will not be set aside if there was a sufficient number of other unchallenged members who voted for the decision. Thompson v. Long Beach, 41 Cal.2d 235, 243; 259 P.2d 649, 653.

6. One member of the Board participated in the hearing discussion and decision on March 1, 1974, even though he was not present at the June 29, 1973, hearing.

The petitioner contends that since Board Member Grubb did not attend the June 29, 1973, hearing he should have been barred from participating in the March 1, 1974, hearing.

In support of its position, petitioner cites Rigley v. Board of Retirement, 260 Cal.App.2d 445, 450; 67 Cal.Rptr. 185.

We find that the petitioner's contention is without merit. Rigley is not the ruling law and is not in point with the instant case. In Rigley the Board of Retirement was operating under by-laws and regulations which had been duly adopted pursuant to Government Code Section 31525, were binding and could not be modified. The by-laws in that case provided that no member could vote who was not present at all phases of the hearing.

Government Code Section 11517(a) provides, in part, that if a contested case is heard before an agency itself, no member thereof who did not hear the evidence shall vote on the decision. It has been established, however, that this section does not require auditory perception of all evidence by each Board member who votes, nor physical presence when evidence was produced. Rather, it requires simply that each member who votes

be acquainted with the record, and this acquaintance may be achieved by reading a transcript of the evidence or by obtaining adequate knowledge of its contents in some other manner. Cooper v. State Board of Medical Examiners, 35 Cal.2d 242, 246; 217 P.2d 630,632.

Finally, even if Cooper were not accepted as the ruling case law, the record clearly shows that petitioner and all interested parties were given due notice that the March 1, 1974, hearing was a de novo hearing, and that all relevant evidence necessary to the matter would be taken at that hearing. Thus, any member who was present at that hearing clearly would have been entitled to participate. It may also be noted that Board Member Grubb's vote was not decisive since five other members who were present at both meetings voted for the order.

7. The Board was hostile to petitioner's proposal for reasons unrelated to the considerations properly before the Board.

Petitioner contends that Board Member Fett's demeanor and examination of petitioner's experts was improper and prejudicial. Petitioner cites the transcripts of both the June 29, 1973, hearing and the March 1, 1974, hearing, and alleges that Mr. Fett made a personal attack upon a witness which was rude and insulting.

Although petitioner's allegations are not germane to this review, we believe that they should be discussed.

A review of the reporter's transcripts of both hearings does not bear out petitioner's contentions. Mr. Fett, who is himself a California Certified Engineering Geologist, questioned the petitioner's expert witness, Mr. Park, for an apparent purpose of ascertaining his credibility and qualifications. Later he

questioned the reliability, authenticity and authorship of an unsigned written report by Mr. Frasca which the petitioner sought to enter into evidence. During the March 1, 1974, hearing Mr. Fett again engaged in discussion with petitioner's counsel regarding qualification of witnesses and later during his examination of Mr. Frasca he courteously explained his reasons for questioning unsigned reports.

We find that the petitioner's allegations are unfounded and without merit.

V. CONCLUSIONS

After review of the record, and consideration of contentions of the petitioner, the State Board concludes as follows:

1. Order No. 74-64 was supported by substantial evidence before the Regional Board.
2. The action of the Regional Board was appropriate and proper.

THEREFORE, IT IS HEREBY ORDERED that the petition of
Project Alpha be, and it is, denied.

Dated: SEP 19 1974

W W Adams

W. W. Adams, Chairman

Ronald B. Robie

Ronald B. Robie, Vice Chairman

Roy E. Dodson

Roy E. Dodson, Member

Mrs. Carl H. Auer

Mrs. Carl H. (Jean) Auer, Member

ABSENT

W. Don Maughan, Member