

**STATE OF CALIFORNIA
OFFICE OF ADMINISTRATIVE LAW**

In re:)	
)	
OFFICE OF EMERGENCY SERVICES)	DECISION OF DISAPPROVAL OF CERTIFICATE COMPLIANCE
Title 19)	(Gov. Code, sec. 11349.6(d))
Adopt Sections 2575, 2575.1, 2575.2, 2576, 2576.1, 2577, 2577.1, 2577.2, 2577.3, 2577.4, 2577.5, 2577.6, 2577.7, 2577.8, 2578, 2578.1, 2578.2 of the California Code of Regulations)	OAL File No. 02-0731-03 C
)	
)	

SUMMARY OF REGULATORY ACTION

This filing is a certificate of compliance for emergency regulations which established procedures to ensure the timely submission of inundation maps adequate for the purpose of evacuation planning in the event a dam fails. On September 12, 2002, the Office of Administrative Law (“OAL”) disapproved this certificate of compliance for the following reasons: the Notice of Proposed Action (“NOPA”) was not published in the California Regulatory Notice Register; the NOPA did not give adequate notice of the public hearing; the NOPA does not have the required adverse economic impact finding and cost description, nor the assessment required by section 11346.5(a)(10) of the Government Code; the rulemaking file does not contain an initial statement of reasons; the statements of mailing are inadequate; the rulemaking file does not contain an adequate transcript, recording, or minutes of the public hearing; the STD 399 form was not signed and may not be accurate; the rulemaking file does not contain a document which is incorporated by reference; the STD 400 form is incomplete; and the regulation fails to comply with the necessity, clarity and consistency standards of the Administrative Procedure Act. On September 12, 2002, OAL also approved the readoption of the underlying emergency regulations which had been revised by OES to address the clarity and consistency problems discussed herein.

DISCUSSION

Regulations adopted by the Office of Emergency Services (“OES”) concerning inundation maps must be adopted pursuant to the Administrative Procedure Act (“APA”). Any regulatory act adopted by a state agency through the exercise of quasi-legislative power delegated to the agency by statute is subject to the APA unless the act is expressly exempted or excluded by statute from APA coverage. (Gov. Code, sec. 11346(a).) No exemption or exclusion applies to the

regulatory action here under review. Thus, before the instant regulatory action may become effective, it is subject to a review by the OAL for compliance with procedural requirements of the APA and for compliance with certain substantive standards. (Gov. Code, sec. 11349.(a).)

1. THE NOTICE OF PROPOSED ACTION WAS NOT PUBLISHED AND WAS INADEQUATE

The Notice of Proposed Action (“NOPA”) provides information to the public about the proposed regulatory action undertaken by the adopting state agency. Subdivision (a) of section 11346.4 of the Government Code provides:

“(a) At least 45 days prior to the hearing and close of the public comment period on the adoption, amendment, or repeal of a regulation, notice of the proposed action shall be:

(1) Mailed to every person who has filed a request for notice of regulatory actions with the state agency. Each state agency shall give a person filing a request for notice of regulatory actions the option of being notified of all proposed regulatory actions or being notified of regulatory actions concerning one or more particular programs of the state agency.

(2) In cases in which the state agency is within a state department, mailed or delivered to the director of the department.

(3) Mailed to a representative number of small business enterprises or their representatives that are likely to be affected by the proposed action.

“Representative” for the purposes of this paragraph includes, but is not limited to, a trade association, industry association, professional association, or any other business group or association of any kind that represents a business enterprise or employees of a business enterprise.

(4) When appropriate in the judgment of the state agency, mailed to any person or group of persons whom the agency believes to be interested in the proposed action and published in the form and manner as the state agency shall prescribe.

(5) Published in the California Regulatory Notice Register as prepared by the office for each state agency's notice of regulatory action.

(6) Posted on the state agency's website if the agency has a website.” (Emphasis added.)

Although the NOPA for this regulatory action was apparently mailed out and posted on the OES website, the NOPA was not published in the California Regulatory Notice Register as required by section 11346.4 (a)(5) of the Government Code. Also the NOPA mailed out and posted on the OES website only provided 30 days notice of the last public hearing on the proposed regulatory action. Section 11346.4(a) of the Government Code requires that the NOPA be mailed, published, and posted at least 45 days prior to the public hearing.

Section 11346.5 of the Government Code specifies the required content of the NOPA. Subdivision (a) of section 11346.5 of the Government Code provides:

(a) The notice of proposed adoption, amendment, or repeal of a regulation shall include the following:

...

(7) If a state agency, in proposing to adopt, amend, or repeal any administrative regulation, makes an initial determination that the action may have a significant, statewide adverse economic impact directly affecting business, including the ability of California businesses to compete with businesses in other states, it shall include the following information in the notice of proposed action:

(A) Identification of the types of businesses that would be affected.

(B) A description of the projected reporting, recordkeeping, and other compliance requirements that would result from the proposed action.

(C) The following statement: 'The (name of agency) has made an initial determination that the (adoption/amendment/repeal) of this regulation may have a significant adverse economic impact on businesses, including the ability of California businesses to compete with businesses in other states. The (name of agency) (has/has not) considered proposed alternatives that would lessen any adverse economic impact on business and invites you to submit proposals.

Submissions may include the following considerations:

(i) The establishment of differing compliance or reporting requirements or timetables that take into account the resources available to businesses.

(ii) Consolidation or simplification of compliance and reporting requirements for businesses.

(iii) The use of performance standards rather than prescriptive standards.

(iv) Exemption or partial exemption from the regulatory requirements for businesses.'

(8) If a state agency, in adopting, amending, or repealing any administrative regulation, makes an initial determination that the action will not have a significant, statewide adverse economic impact directly affecting business, including the ability of California businesses to compete with businesses in other states, it shall make a declaration to that effect in the notice of proposed action. In making this declaration, the agency shall provide in the record facts, evidence, documents, testimony, or other evidence upon which the agency relies to support its initial determination.

An agency's initial determination and declaration that a proposed adoption, amendment, or repeal of a regulation may have or will not have a significant, adverse impact on businesses, including the ability of California businesses to compete with businesses in other states, shall not be grounds for the office to refuse to publish the notice of proposed action.

(9) A description of all cost impacts, known to the agency at the time the notice of proposed action is submitted to the office, that a representative private person or business would necessarily incur in reasonable compliance with the proposed action.

If no cost impacts are known to the agency, it shall state the following:

‘The agency is not aware of any cost impacts that a representative private person or business would necessarily incur in reasonable compliance with the proposed action.’

(10) A statement of the results of the assessment required by subdivision (b) of Section 11346.3. . . .”

Section 11346.3 of the Government Code provides:

“(a) State agencies proposing to adopt, amend, or repeal any administrative regulation shall assess the potential for adverse economic impact on California business enterprises and individuals, avoiding the imposition of unnecessary or unreasonable regulations or reporting, recordkeeping, or compliance requirements. For purposes of this subdivision, assessing the potential for adverse economic impact shall require agencies, when proposing to adopt, amend, or repeal a regulation, to adhere to the following requirements, to the extent that these requirements do not conflict with other state or federal laws:

(1) The proposed adoption, amendment, or repeal of a regulation shall be based on adequate information concerning the need for, and consequences of, proposed governmental action.

(2) The state agency, prior to submitting a proposal to adopt, amend, or repeal a regulation to the office, shall consider the proposal’s impact on business, with consideration of industries affected including the ability of California businesses to compete with businesses in other states. For purposes of evaluating the impact on the ability of California businesses to compete with businesses in other states, an agency shall consider, but not be limited to, information supplied by interested parties.

It is not the intent of this section to impose additional criteria on agencies, above that which exists in current law, in assessing adverse economic impact on California business enterprises, but only to assure that the assessment is made early in the process of initiation and development of a proposed adoption, amendment, or repeal of a regulation.

(b) (1) All state agencies proposing to adopt, amend, or repeal any administrative regulations shall assess whether and to what extent it will affect the following:

(A) The creation or elimination of jobs within the State of California.

(B) The creation of new businesses or the elimination of existing businesses within the State of California.

(C) The expansion of businesses currently doing business within the State of California.

(2) This subdivision does not apply to the University of California, the Hastings College of the Law, or the Fair Political Practices Commission.

(3) Information required from state agencies for the purpose of completing the assessment may come from existing state publications.

(c) No administrative regulation adopted on or after January 1, 1993, that requires a report shall apply to businesses, unless the state agency adopting the

regulation makes a finding that it is necessary for the health, safety, or welfare of the people of the state that the regulation apply to businesses.”

The NOPA mailed and posted by OES for this regulatory action did not contain the information required by subdivisions (a)(7) through (a)(10) of section 11346.5 of the Government Code nor the assessment or finding required by section 11346.3 of the Government Code. In this regard, subdivision (d)(2) of section 11349.1 of the Government Code requires that:

“(d) The office shall return any regulation subject to this chapter to the adopting agency if any of the following occur:

...

(2) the agency has not complied with Section 11346.3. . . .”

Please also note that based upon in the rulemaking record submitted, it cannot be determined when the NOPA was mailed out to the public. The affidavit of mailing included in the rulemaking file at Tab J does not state the date the NOPA was mailed nor does it indicate compliance with the mailing requirements of section 11346.4(a)(1) to (4). Upon resubmittal, please see section 86 of title 1 of the California Code of Regulations for the required content of the mailing statement for a NOPA.

The affidavit of mailing for the 15 day notice which is included in the rulemaking file at Tab M contains similar problems. Please see section 44(b) of title 1 of the California Code of Regulations for the required content for the mailing statement of a 15 day notice.

2. THE RULEMAKING FILE DOES NOT CONTAIN AN INITIAL STATEMENT OF REASONS

Section 11347.3 of the Government Code describes the documents that must be included in the rulemaking file by the adopting agency. Section 11347.3 provides in pertinent part:

“(a) Every agency shall maintain a file of each rulemaking that shall be deemed to be the record for that rulemaking proceeding.

Commencing no later than the date that the notice of the proposed action is published in the California Regulatory Notice Register, and during all subsequent periods of time that the file is in the agency’s possession, the agency shall make the file available to the public for inspection and copying during regular business hours.

(b) The rulemaking file shall include:

...

(2) All published notices of proposed adoption, amendment, or repeal of the regulation, and an updated informative digest, the **initial statement of reasons**, and the final statement of reasons. . . .” (Emphasis added.)

The initial statement of reasons is the document which describes the reasons for the proposed regulatory action so that the public is given a meaningful opportunity to comment.

Section 11346.2 of the Government Code provides in pertinent part:

“Every agency subject to this chapter shall prepare, submit to the office with the notice of the proposed action as described in Section 11346.5, and make available to the public upon request, all of the following:

...

(b) An initial statement of reasons for proposing the adoption, amendment, or repeal of a regulation. This statement of reasons shall include, but not be limited to, all of the following:

(1) A statement of the specific purpose of each adoption, amendment, or repeal and the rationale for the determination by the agency that each adoption, amendment, or repeal is reasonably necessary to carry out the purpose for which it is proposed. Where the adoption or amendment of a regulation would mandate the use of specific technologies or equipment, a statement of the reasons why the agency believes these mandates or prescriptive standards are required.

(2) An identification of each technical, theoretical, and empirical study, report, or similar document, if any, upon which the agency relies in proposing the adoption, amendment, or repeal of a regulation.

(3) (A) A description of reasonable alternatives to the regulation and the agency’s reasons for rejecting those alternatives. In the case of a regulation that would mandate the use of specific technologies or equipment or prescribe specific actions or procedures, the imposition of performance standards shall be considered as an alternative.

(B) A description of any reasonable alternatives the agency has identified or that have otherwise been identified and brought to the attention of the agency that would lessen any adverse impact on small business. It is not the intent of this paragraph to require the agency to artificially construct alternatives or to justify why it has not identified alternatives.

(4) Facts, evidence, documents, testimony, or other evidence on which the agency relies to support an initial determination that the action will not have a significant adverse economic impact on business.

(5) A department, board, or commission within the Environmental Protection Agency, the Resources Agency, or the Office of the State Fire Marshal shall describe its efforts, in connection with a proposed rulemaking action, to avoid unnecessary duplication or conflicts with federal regulations contained in the Code of Federal Regulations addressing the same issues. These agencies may adopt regulations different from federal regulations contained in the Code of Federal Regulations addressing the same issues upon a finding of one or more of the following justifications:

(A) The differing state regulations are authorized by law.

(B) The cost of differing state regulations is justified by the benefit to human health, public safety, public welfare, or the environment. . . .”

The rulemaking file submitted to OAL with this regulatory action did not contain an initial statement of reasons as required by section 11347.3(b)(2) of the Government Code,

nor does it appear that this document was made available to the public during the public comment period as required by section 11346.2 of the Government Code.

3. THE RULEMAKING FILE DOES NOT CONTAIN A TRANSCRIPT, RECORDING OR MINUTES OF THE PUBLIC HEARINGS.

Section 11347.3(b)(8) of the Government Code provides that:

“(b) The rulemaking file shall include:

...

(8) A transcript, recording, or minutes of any public hearing connected with the adoption, amendment, or repeal of the regulation. . . .”

Section 90 of title 1 of the California Code of Regulations describes what constitutes an adequate “transcript”, “recording”, or “minutes” for purposes of section 11347.3 of the Government Code. Section 90 provides:

“(a) Information submitted in compliance with the requirements of Government Code section 11347.3(a)(8) shall fully and accurately reflect all proceedings applicable to the rulemaking action under review and shall be adequate:

(1) to ensure effective review of the record by OAL, in light of the provisions of the APA providing for meaningful public participation; and

(2) to permit effective judicial review of the record.

(b) Material submitted as a ‘transcript’ or ‘recording’ in fulfillment of this requirement shall consist of a word-by-word, speaker-by-speaker record of all that is said on the record in any and all public hearings or meetings held as part of the adoption, amendment or repeal of the regulation in question.

(c) ‘Minutes’ submitted in fulfillment of this requirement shall provide a summary of the proceedings, and in all cases shall contain information sufficient to meet the requirement specified in subsection (a).

(d) Where information submitted pursuant to this section also contains material that is unrelated to the subject of the rulemaking action, that information submitted in compliance with subsection (b) or (c) shall be clearly identified as such.”

The public hearing record contained in Tab L of the rulemaking file contains only sign in sheets for the public hearings and apparently some written notes submitted by a public commenter at one of the hearings. This does not provide enough of a record to ensure effective review by OAL and is violative of section 11347.3(b)(8) of the Government Code and Section 90 of title 1 of the California Code of Regulations.

4. THE FISCAL IMPACT STATEMENT FORM STD. 399 SUBMITTED IN THIS RULEMAKING FILE IS UNSIGNED AND MAY NOT BE ACCURATE.

Section 11349.1(d)(1) of the Government Code provides:

“The office shall return any regulation subject to this chapter to the adopting agency if any of the following occur:

(1) The adopting agency has not prepared the estimate required by paragraph (6) of subdivision (a) of Section 11346.5”

Paragraph (6) of subdivision (a) of section 11346.5 of the Government Code requires the following:

“An estimate, prepared in accordance with instructions adopted by the Department of Finance, of the cost or savings to any state agency, the cost to any local agency or school district that is required to be reimbursed under Part 7 (commencing with Section 17500) of Division 4, other nondiscretionary cost or savings imposed on local agencies, and the cost or savings in federal funding to the state.

For purposes of this paragraph, ‘cost or savings’ means additional costs or savings, both direct and indirect, that a public agency necessarily incurs in reasonable compliance with regulations.”

Section 6650 of the State Administrative Manual provides in pertinent part:

“. . . Every true regulation must include an estimate and/or determination by the issuing agency of its fiscal effect on governmental agencies. The Fiscal Impact Statement form, STD. 399, has been developed for this purpose. . . .

The OAL will not approve regulation filings which do not include a properly completed STD. 399. Instead, OAL is required by Government Code Section 11349.1(d) to return any regulation to the adopting agency if the adopting agency

1. Has not prepared the required cost estimate, including the data, assumptions and calculations on which it is based, and included it in the rulemaking file. . . .”

Section 6680 of the State Administrative Manual provides in pertinent part:

“The STD. 399 form must be approved and signed by the Agency Secretary. The form must also be signed by the appropriate Program Budget Manager in the DOF if there are fiscal impact disclosures required by SAM Section 6600-6670, in which case the Fiscal Impact Statement (FIS) portion of STD. 399 is to be completed. **State boards, offices, or departments not under an Agency Secretary must have the form signed by the highest ranking official in the organization . . .**” (Emphasis added.)

The STD. 399 included in this rulemaking file at Tab P is not signed by anyone.

Also, in response to a comment challenging the estimate that the proposed regulations should not result in additional costs to public agencies (1 (e)), OES responded that “. . . there is no ‘additional’ regulatory cost for doing what has been previously required under statute.”

However, the proposed regulations appear to contain requirements, such as the preparation of technical studies, which are not specified in the implementing statutes.

5. THE RULEMAKING FILE DOES NOT CONTAIN A DOCUMENT WHICH WAS INCORPORATED BY REFERENCE.

OAL has adopted section 20 of title 1 of the California Code of Regulations to assure that material incorporated by reference in regulations conforms to the requirements of the APA. Section 20 of title 1 provides in pertinent part:

“ (a) ‘Incorporation by reference’ means the method whereby a regulation printed in the California Code of Regulations makes provisions of another document part of that regulation by reference to the other document.

(b) Material proposed for ‘incorporation by reference’ shall be reviewed in accordance with procedures and standards for a regulation published in the California Code of Regulations . . .

...

(d) If the document is a formal publication reasonably available from a commonly known or identified source, the agency need not provide six duplicate copies of the document under Government Code section 11343(c)”

Section 2577.4 of the proposed regulations describes the content of the required technical study. Subsection (d) of section 2577.4 requires that the technical study

“Use worst case breaching parameters based on National Weather Service breaching guidance, (Fread, D.L. (1988). The NWS DAMBRK model: Theoretical background and user documentation, HRL-258, Hydrological Research Laboratory, National Weather Services, Silver Spring, Maryland 20910, and incorporated by reference herein.”

Although subsection (d) of section 20 of title 1 of the California Code of Regulations may excuse rulemaking file from including six copies of the incorporated document, the rulemaking file submitted with the regulatory action did not contain a single copy of the incorporated document for review as provided in subsection (b) of section 20.

6. SOME PROVISIONS OF THE REGULATIONS ARE UNCLEAR

The Legislature in establishing OAL, found that regulations, once adopted, were frequently unclear and confusing to the persons who must comply with them. (Gov. Code, sec. 11340(b).) For this reason, OAL is mandated to review each regulation adopted pursuant to the APA to determine whether the regulation complies with the “clarity” standard. (Gov. Code, sec. 11349.1(a)(3).) “Clarity” as defined by Government Code section 11349(c) means “written or displayed so that the meaning or regulations will be easily understood by those persons directly affected by them.”

a. Section 2575.2 of the proposed regulations defines the terms used in the regulations. Subsection (a) of section 2575.2 provides:

“‘Alteration’: Has the same meaning as specified in Sections 6002-6008 of the Water Code.”

However, the term “Alterations” is defined only in section 6006 of the Water Code. A person directly affected by the regulation would not easily understand how the other sections of the Water Code cited affect the meaning of the term “alteration”.

Subsections (g), (o), (ii), and (rr) suffer from the same infirmity which apparently could be remedied by referring to Water Code sections 6002, 6007, 6004.5, and 6008, respectively.

b. Subsection (n) of section 575.2 defines “Dynamic Routing” as:

“Hydraulic flow routing based on the solution of the St.-Venant equation(s) to compute the changes of discharge and stage with respect to time at various locations along the stream.”

A person directly affected by the regulation would not understand from the regulation what the “St.-Venant equation(s)” is. If the intent here is to incorporate another document by reference, please see section 20 of title 1 of the California Code of Regulations.

c. Section 2577.8 of the proposed regulations provides that OES “. . . shall notify the dam owner in writing that an inundation map is approved or not approved and the reason(s) therefor.” However, section 2577.8 does not provide a time frame for this notification so the dam owner would not understand from the regulation when to expect to be notified.

d. Section 2578 of the proposed regulations provides that a dam owner may apply for a waiver from producing an inundation map. Section 2578.1 specifies the content of the application and section 2578.2 provides that OES will notify affected local jurisdictions of the application. The proposed regulations end here. A person submitting an application would not understand from the regulation what the process for approval or disapproval might be, nor when to expect a decision and notification thereof.

7. REGULATORY PROVISIONS ARE INCONSISTENT.

OAL is also required to review every regulation adopted by a state agency pursuant to the APA to determine whether the regulation complies with the “consistency” standard. “‘Consistency’ means being in harmony with, and not in conflict with or contradictory to, existing statutes, court decisions, or other provisions of law.” (Gov. Code sec. 11349(d).)

Section 2577.2 of the proposed regulations requires that all inundation maps and technical studies “. . . shall be prepared by, or under the direction of, a civil engineer who is registered pursuant to . . . Business and Professions Code, Division 3, Chapter 7, commencing with section

6700.” However, Chapter 7 of Division 3 of the Business and Professions Code contains a number of exemptions from the registration requirements including certain public employees. In this regard, subsection (e)(3) of section 2577.5 of the proposed regulations requires that the inundation map include at the bottom of each page:

“A block containing the name of the civil engineer, the engineering firm, address and telephone number. A portion of this block will be reserved for the signature, seal and Registered Civil Engineer number of the approving individual upon final approval of the map. **Alternately, an authorized governmental agency pursuant to section 2577.3 may state the agency name, address and telephone number in lieu of engineer information and seal and . . .**” (Emphasis added.)

Subsection (e)(3) of section 2577.5 does not seem to be consistent with the requirement in 2577.2 that the inundation map be prepared by a registered civil engineer.

8. THE RULEMAKING RECORD DOES NOT INCLUDE A SHOWING OF NECESSITY FOR THE REGULATIONS

Government Code section 11349.1 requires that OAL review all regulations for compliance with the “necessity” standard. Government Code section 11349(a) defines “necessity” to mean “. . . the record of the rulemaking proceeding demonstrates by substantial evidence the need for a regulation to effectuate the purpose of the statute, court decision, or other provision of law that the regulation implements, interprets, or makes specific, taking into account the totality of the record. For purposes of this standard, evidence includes, but is not limited to, facts studies, and expert opinion.”

To further explain the meaning of substantial evidence in the context of the “necessity” standard, subdivision (b) of section 10 of title 1 of the California Code of Regulations (CCR) provides:

“In order to meet the ‘necessity’ standard of Government Code section 11349.1, the record of the rulemaking proceeding shall include:
‘(1) a statement of the specific purpose of each adoption, amendment, or repeal;
and
‘(2) information explaining why each provision of the adopted regulation is required to carry out the described purpose of the provision. Such information shall include, but is not limited to, fact, studies, or expert opinion. When the explanation is based upon policies, conclusions, speculation, or conjecture, the rulemaking record must include, in addition, supporting facts, studies, expert opinion, or other information. An ‘expert’ within the meaning of this section is a person who possesses special skill or knowledge by reason of study or experience which is relevant to the regulation in question.”

In order to provide the public with an opportunity to review and comment upon an agency’s perceived need for a regulation, the APA requires that the agency describe the need for the regulation in the initial statement of reasons. (Gov. Code, sec. 11346.2(b).) The initial statement of reasons must include a statement of the specific purpose for each adoption, amendment, or

repeal and the rationale for the determination by the agency that each regulation is reasonably necessary to carry out the purpose for which it is proposed (Gov. Code, sec. 11346.2(b)(1)) or, simply restated, “why” a regulation is needed and “how” this proposed regulation fills that need. The initial statement of reasons must be submitted to OAL with the initial notice of the proposed action and made available to the public during the public comment period, along with all the information upon which the proposal is based. (Gov. Code, secs. 11346.2(b) and 11346.5(a)(16) and (b).) It is only in this way that the public can be fully informed about the regulatory action and may comment knowledgeably. The initial statement of reasons and all data and other factual information, studies or reports upon which the agency is relying in the regulatory action must also be included in the rulemaking file. (Gov. Code, sec. 11347.3(b)(2) and (7).)

As previously discussed, the rulemaking file submitted with these proposed regulations does not contain an initial statement of reasons. In addition, the final statement of reasons submitted with the rulemaking file recites only what the regulations do without giving any reasons for the provisions contained therein. As a result, the rulemaking record does not demonstrate by substantial evidence the need for the provisions contained in the proposed regulations.

Lastly, on resubmission, please make sure that all the proposed regulation sections are shown as adoptions in box B. 2 and that the effective date is indicated in Box B. 5 of the form STD. 400. Also, for future reference, the summaries and responses to comments and the determination of mandate required by subdivisions (a)(2) and (a)(3) of Government Code section 11346.9 should be physically located within the final statement of reasons.

September 19, 2002

CRAIG S. TARPENNING
Senior Staff Counsel

For:

David B. Judson
Deputy Director/Chief Counsel

Original: Dallas Jones, Director
Cc: Robert M. Mead