

DRAFT  
MINUTES OF THE CARLTON COUNTY  
BOARD OF ADJUSTMENT MEETING  
March 9, 2011

The 2010 Board of Adjustment Chairman DeMenge called the Public Hearing to order at 3:00 PM.

Members Present: Tom Hill, Marcus Bruning, Stan DeMenge, Doug Suhonen (Alternate), Jack Ezell (Alternate), and Steve Bassa (Recording Secretary).

Absent: None

DeMenge stated that he will abstain from taking part in this new public hearing and that a motion would be in order for a (temporary) Chairman for this meeting.

Hill also stated that he will abstain from taking part in today's meeting.

Motion was made by Bruning, seconded by Ezell to appoint Suhonen as (temporary) Chairman of today's meeting.

With this matter completed, Stan DeMenge stated that he will remove himself from the Chairmanship and abstain from participating in this meeting or acting on this matter (as well as Hill) and that the public hearing be taped (in its entirety) and that the secretary stop the public hearing if the recorder fails to operate properly and resume the hearing only after the recording problem is resolved.

Chairman Suhonen stated that the legal advertisement for today's meeting was sent to the Arrowhead Leader on February 17, 2011 and published in the Arrowhead Leader on February 24, 2011.

Appeal #310026: Matthew DeCaigny

Request: Appeal decision of Wetland Conservation Act – staff decision to deny Exemption #610015 – Forestry Exemption.

Matthew DeCaigny was present and represented by Ray Higgins, from the Minnesota Timber Producers Association, 324 West Superior Street, Suite 902, Duluth, MN 55802.

Also present were: Wayne Brandt, Executive Vice-President of the Minnesota Timber Producers Association.

David Oberstar, Attorney from the Fryberger Law Firm of Duluth, MN

Mr. Higgins then distributed copies of his power point presentation to the acting board members and secretary.

- First 2 slides of presentation were pictures of the road showing new regeneration of birch, tamarack, etc., along the road according to Mr. Higgins.
- Third slide was an aerial view of the DeCaigny property and project.
- Minn. Statute 103G.2241(7) – exempts permanent access from forest roads.
- General information of the road on DeCaigny property.
- "Forest Management Guidelines" excerpts were noted.

Mr. Higgins then discussed issues with:

Matthew DeCaigny (landowner) – according to Mr. DeCaigny, after he purchased the property he immediately noticed that it had some mature timber that needed to be harvested. (Access was prohibited by a large expanse of wetland).

Mr. DeCaigny stated that he contacted a local logger, David Berthiaume of Berthiaume Logging, who referred him to SAPPI Paper Company about harvesting this timber. Eventually the road was constructed and the timber harvested by Berthiaume Logging.

Prior to beginning the project, Mr. DeCaigny and Mr. Berthiaume walked across the wetland more than once to view the harvest area and to determine a proper access route to it. The wetland area was dry and not wet according to the owner/applicant.

Mr. DeCaigny stated that in 2004, he constructed some trails (during the weekends) on an adjoining forty acres and through wetland, which he got into trouble for. He ended up resolving the matter with the County, State (BWSR and DNR), and Army Corps of Engineers by purchasing credits for the wetland filling of part of his initial road/trail. That road is not real close to, but a spur of the road in question at today's meeting.

The initial road was constructed for recreational trails, while the new (2008) road in question was constructed for the harvest of timber according to Mr. DeCaigny.

Mr. Higgins then called David Berthiaume, President of Berthiaume Logging, to comment on his involvement with the project. (Mr. Berthiaume's State and National awards, as well as "guideline training", were noted by Mr. Higgins).

According to Mr. Berthiaume, an access road to the timber site was constructed across the narrowest part of the wetland, between two higher, non-wetland areas.

The road was constructed by corduroying logs cut on-site in a criss-cross manner, with stumps being placed upside down on road bed, then covered by excavated mineral soil, and peat being put back in the hole (excavation area).

Summer harvesting was done to scarify the ground in order for the birch, maple, oak, and balsam to "come back"/regenerate.

The road was constructed wide enough so 8 1/2' wide, 90,000 lb. trucks and 13' to 17' wide skidders would have a wide enough road bed to travel on.

Also, the 8 1/2' x 13 1/2' trailers that they haul wood chips out with are top heavy and can easily be pulled to the edge and tip over into the wetland on an extremely narrow road.

According to Berthiaume, the only areas where they could have removed on-site fill from were very small landing areas on the west and east sides of the wetland.

Mr. Berthiaume is familiar with the forest management guidelines, carries a book of them in his vehicle, and uses them during all road construction – including Mr. DeCaigny's road.

As previously stated, summer harvest was chosen over winter in order to create a more diverse forest regeneration and since he did not have as much summer wood as winter wood for market.

The depth of the peat excavated ranged from 1'-3' and allowed easy access to a suitable mineral, fill soil according to Mr. Berthiaume.

Craig Ferguson, a forester at SAPPI Fine Paper, who has a U of M forestry degree and who was trained in forest management guidelines was called on by Mr. Higgins since he was involved with the initial planning and forest harvesting on the DeCaigny property.

Mr. Ferguson stated that his college undergraduate courses included an entire semester at the U of M that was spent on forest management guidelines training.

Mr. Ferguson stated that the forest access road was constructed properly (including width) using the forest management guidelines.

Summer harvest was done to encourage regeneration of other species instead of only poplar. Winter harvest does not scarify the soil so varied forest regeneration is not encouraged by such a method.

Mr. Ferguson stated that he had walked through the wetland several times prior to the actual harvest and it was dry – not wet.

He also provided freshly cut (3/9/11) birch and tamarack saplings from the site which would not be present in a deep wetland.

A spruce “cookie” sample was also brought in from the site today for further evidence of a shallow peat wetland.

A total of 1,000 tons of biomass was removed from the DeCaigny property which would require 50 or so truck loads to haul.

Again, summer harvest was done to encourage the regeneration of softwoods, etc., other than poplar, according to Mr. Ferguson.

Richard “Finn” Ostman of Angora, MN, currently a private consulting forester (with various listed credentials), was called on by Mr. Higgins for testimony.

Mr. Ostman stated that while employed with Potlatch Corp. in the 1990's, he was involved with the formation of the first forest management BMP's.

He was on an Environmental Management Committee (national) which formed the Environmental Management guidelines used by Potlatch Corp.

When asked of his first impression of the DeCaigny road by R. Higgins, Ostman stated, “boy this was a good job.”

Higgins: In what ways?

- Ostman:
- 1) Nice, shallow approaches to the wetland area.
  - 2) Siltation fences were installed on the far side-where some borrow had been removed from.
  - 3) Culverts were placed so the road neither dammed or drained the wetland.

Corduroying was used for two reasons according to Ostman.

- 1) To provide floatation for equipment.
- 2) Acts to keep fill soil in place and not spilling into the wetland.

The criss-crossing corduroy pattern used on this road is perfect for a shallow peat wetland – opposed to using fabric with parallel stocking or corduroying – criss-cross method used here allows builder to keep the road much narrower.

Higgins: If you were to go out on the road and punch some holes, would you be surprised not to find any trees or logs?

Ostman: Not really, because criss-crossing involves using a minimal amount of wood and since the logs/trees are not stacked next to each other, you may have drilled/dug between the trees/logs.

Higgins: If this was a deep wetland, would you get your feet wet crossing it?

Ostman: Probably not – you can tell a deep peat wetland which is hummocky and spongy, much like walking on a feather bed. Walking on this wetland was firm according to both the logger and landowner.

This area was probably a glacial lake 5,000 years ago and it appears that this crossing area was probably a shallow sand bar.

Higgins: If this road had been constructed in a deep peat wetland would the road have held up to the equipment and the hauling of 50 or so loads of lumber?

Ostman: No, it would have needed to be much higher and wider with fabric also needing to be used.

According to Ostman, it appears the construction methods used were perfect for the conditions found, as evidenced by the road holding up as it has with all of the equipment and travel over it.

Higgins: Are there other reasons to build forest roads other than for harvest?

Ostman: Yes, Silviculture not only involves harvesting, but is the growing, caring, and nurturing of a forest for the life of that particular stand of trees.

It appears that this area formerly contained white pine (remnants observed there) and regeneration of such a species will not occur without scarification.

If pine does regenerate here, what will the owner do for access in case of a fire and other activities to help grow and maintain the new forest?

There was a very small area on-site, in which to have removed fill material for the road according to Mr. Ostman.

Hauling fill in from off-site would have caused more siltation and wetland disturbance in Ostman's opinion.

Higgins presentation continued with 7 examples/pictures of different forest roads in the region which were constructed in wetland areas using BMP's.

Mr. Higgins then addressed 5 “Findings of Fact”, noted by the TEP as the basis for denial of the forest road exemption, and the applicant’s response to those findings – see copy of Higgins’ power point presentation entered into the file on 3/9/11.

Summary of applicant’s response to the “Findings of Fact”:

- 1) Road was built with proper width for moving timber and equipment.
- 2) Road was built at narrowest point in the wetland.
- 3) Proper number of culverts were used.
- 4) Culverts were proper diameter.
- 5) Road approaches to the wetland were constructed to reduce erosion into the wetland.
- 6) Construction method for a shallow peat wetland was utilized.

Higgins then addressed a new issue from the November 29, 2010 meeting; that being peat depth:

- 1) Peat depth in wetland (verified by David Berthiaume, Craig Ferguson, and Matt DeCaigny) was in the 2’-3’ range calling for a shallow peat wetland construction technique.
- 2) Peat depth was not measured or referenced by the TEP.
- 3) Web soil survey information must be verified by specific site soil borings to know 100% what is at the site according to Mike Walezynski, Area Resource Soil Scientist at the USDA NRCS Office in Duluth, MN.

Mr. Higgins’ final summary stated 13 points why the road should be granted a wetland forest road exemption (see enclosed power point presentation copies).

There were no questions by the Board of Adjustment members at this time.

Chairman Suhonen then called for the (county’s) TEP presentation.

Bruce Benson, Carlton County Zoning Administrator (also Carlton County Administrator of the Minnesota Wetland Conservation Act) and Chairman of the Carlton County Wetland Technical Evaluation Panel (TEP) was present to give a brief overview of the county’s position that the project does not qualify for a wetland exemption. The construction methods did not minimize the wetland impact, and therefore, does not comply with the Wetland Conservation Act.

Mr. Benson then gave a power point presentation (copy entered into the record) of a chronological summary of the events leading to today’s appeal hearing.

The following exhibits (previously mailed to the Board of Adjustment Members) were entered into the record by Mr. Benson

2008 Impact

- |           |  |
|-----------|--|
| Exhibit A | Restoration Order ICR# N10000464   |
| Exhibit B | Application Form for a Certificate of No Loss or Exemption   |
| Exhibit C | National Wetlands Inventory Map  |
| Exhibit D | Notice of Decision, Findings of Fact and Forestry Exemption Guidance for Local Government Units  |
| Exhibit E | Minutes of October 5, 2010 Technical Evaluation Panel Meeting  |
| Exhibit F | Photos of the site   |
| Exhibit G | Sustaining Minnesota Forestry Resources Wetland-Forest Roads   |
| Exhibit H | Field Guide Sheet for Gathering Evidence for Order – 8/25/10   |
| Exhibit I | Order, Remand of Wetland Conservation Act Appeal   |
| Exhibit J | Minnesota Forest Resources Council letter authored by Robert Slesak<br>MN DNR letter from Dave Epperly, Director, Division of Forestry |

2004 Impact

Exhibit K	Wetland Conservation Act Cease and Desist Order and Restoration Order
Exhibit L	Application Form for a Certificate of No Loss or Exemption
Exhibit M	Application Form for Water/Wetland Projects – for Replacement Plan

A 2010 aerial photo of the DeCaigny property was shown indicating the wetland types and the applicant's 2004 and 2008 wetland impact areas.

Next, Mike Scott, Minnesota DNR Wetland and Waters Resources Enforcement Officer, discussed the DNR Conservation Officers role in issuing Restoration Orders for work within wetland areas.

Mr. DeCaigny's Restoration Order was issued by Minnesota DNR Conservation Officer, Scott Staples, on July 6, 2010.

When a Restoration Order form is issued, there are 3 things that the recipient is required to do:

- 1) Comply with the work required in the Restoration Order.
- 2) Appeal the Restoration Order to BWSR that they disagree with Restoration Order being heard 30 days of being served.
- 3) Apply for an Exemption, No-Net Loss, or Replacement Plan within at least 21 days of issuance of Restoration Order.

Another component discussed by Mr. Scott was the Contractor's Responsibility Form which has been in effect for about ten years.

If a landowner contracts with someone else to do his wetland work, this form must be signed by the contractor and be mailed to the appropriate government agency. This protects both parties – the contractor and landowner.

The appropriate governmental agency receives the Notice and may visit the property before or during the work which may prevent smaller problems from turning into much larger problems.

(Mr. Scott submitted blank copies of the Restoration Order and Contractor's Responsibility forms for the record).

Mr. Bruning reiterated Mr. Scott's presentation to make sure he understood it correctly: the state statute recommends, but doesn't require, a property owner to complete a form in which to work within a wetland. However, if a contractor or an individual provides a service for another person for any work within a wetland, a Contractor's Responsibility Form must be completed.

Mr. Scott replied that Mr. Bruning's understanding is correct.

(No Contractor's Responsibility Form was submitted by Berthiaume Logging for the road construction on this project).

Heather Cunningham, Carlton County's Resource and Recycling Coordinator, stated that her presentation will give a chronological summary or timeline of the DeCaigny file and reasons why the Forestry Road Exemption has been denied.

Technical background: B.S. degree in Geology with emphasis on hydrology from the U of M – Duluth. A wetland delineator for 7 years, and Carlton County Wetland Conservation Act regulator for the past 4 years.

Ms. Cunningham submitted a Carlton County Wetland Conservation Act Running Record for Application #61005: Mr. Matt DeCaigny, as well as copy of her power point presentation.

Ms. Cunningham's presentation included a 2008 aerial photograph of the DeCaigny property with a National Wetlands Inventory Map overlay and the 2004 and 2008 impact areas shown.

Ms. Cunningham stated that the county determined that the project did not qualify for a forestry exemption:

- Impacts could have been reduced or avoided.
- Excavations impacted the wetland.
- Excavations were not necessary to complete the road and should have been avoided.
- Upland sources of fill were available on site.

Ms. Cunningham stated that based on the data collected, more than 40% of the impact was the result of excavation.

The following letters were entered into the record by H. Cunningham:

- 1) November 15, 2010 letter from Tamara E. Cameron of ACOE to Mr. DeCaigny clarifying if he is applying to the ACOE for an After-the-Fact Permit or a Forest Road Exemption determination.
- 2) November 29, 2010 letter from ACOE to EPA that DeCaigny road does not qualify for a federal forest road exemption and whether it is in compliance with the Federal Clean Water Act.
- 3) February 11, 2011 letter from EPA to ACOE in which Mr. DeCaigny should be given an explicit time period in which to produce information that the road was constructed in compliance with the BMP's. At present, the EPA agrees (with the ACOE) that the DeCaigny road is not exempt under the Clean Water Act, Section 404 (f).
- 4) March 7, 2011 letter from MN DNR, Division of Forestry Director, Dave Epperly to Carlton County Zoning Administrator Bruce Benson that the MN DNR takes no position in this case because it has not conducted a formal inspection of the property.

In summary, the county's original decision to deny the application was because:

- 1) The applicant did not "limit the impact on the hydrologic and biological characteristics of the wetland", and
- 2) The applicant did not "avoid impacts whenever possible".

Dale Krystosek, Senior Wetland Specialist of the Minnesota Board of Water and Soil Resources, has been employed by BWSR for the past 19 years and has been an instructor for the Minnesota Wetland Delineator Certification Program for the past 11 years.

Mr. Krystosek gave a brief chronology of his involvement with the DeCaigny project (see copy of power point presentation which has been entered into the record) and continued with a presentation on "Forestry Exemption Guidance".

Forestry Guidance was developed by a varied interagency committee on 6/23/04.

Forestry Guidance recommends that three questions be answered to qualify:

- 1) Is Silvicultural activity occurring on the property? Answer – Yes.
- 2) Is Silviculture the primary purpose of the road? Answer – Yes, however, the road was excessive for the small amount of acreage to be harvested and road was also used for mineral exploration.
- 3) Will the road construction activity limit impacts to hydrologic and biologic characteristics of the wetland? Answer – No.

Various options were then presented on how avoidance and impacts could have been minimized on the DeCaigny project.

Dale Krystosek's summary:

- 1) TEP correctly used "the Guidance" to make recommendation on forestry exemption liability.
- 2) Staff determined project impacts weren't avoided, where possible.
- 3) Staff determined road construction methods used did not limit the impact of the hydrologic and biologic characteristics of the wetland.
- 4) Staff determined project did not meet "rule of eligibility" requirements for the forestry exemption.
- 5) ACOE and EPA have determined the project is not eligible for the Forestry Exemption under the Clean Water Act.

Joan Weyandt – Wetland Specialist for the NE region of BWSR and TEP member. Technical background includes BS and MS Degrees in Environmental Biology with an emphasis on plant ecology and is also a Certified Wetland Delineator.

Ms. Weyandt gave a power point presentation (copy of which has been entered into the record) that this appeal is based on Minnesota 8420 issues that were not adequately considered at the November 29, 2010 Carlton County Board of Adjustment Meeting.

The TEP determined that the excessive width of the combined road bed and excavation did not limit the impacts on the hydrologic and biologic characteristics of the wetland.

A 2010 air photo of the project was scaled and showed a road approximately 60' in width and 500' in length. Another (2008) air photo showed a more magnified view of the excavation area.

This was compared to a cross section slide of Carlton County Road 22 which was recently rebuilt through a similar wetland area in the western part of Carlton County. The 63' wide county road includes (2) 14' driving lanes, (2) 4' wide shoulders, and inslopes of 13' and 14' totaling 27'.

Impact avoidance could have been accomplished by:

- 1) Borrow material excavated from the wetland for the road could have been taken from on-site upland locations – 40% of this road's impact could have been avoided.
- 2) A seasonal (winter) or temporary road could have been used to access the harvest site.

Why create a permanent road when the applicant has stated that the next harvest would not be for another 15-30 years and that reforestation of the area would be by natural regeneration – not planting.

Summary:

BMP's were not utilized to limit the hydrologic and biologic impacts to the wetland.

Following the completion of all the presentations, Chairman Suhonen adjourned the public hearing for a brief recess before opening the floor for further comments or questions.

Public Hearing was recessed at 5:00 p.m.

The public hearing was reconvened at 5:07 p.m. by Chairman Suhonen to open the floor for other commentary or rebuttal.

Raymond Higgins (MN Timber Producers Association) had the following additional comments to make:

- 1) The Contractor's Responsibility Form issue is separate and has no bearing on approving or denying this appeal.
- 2) There were no hills in which to take borrow from on either ends of the road where the upland met the wetlands. These areas were relatively flat and any removal of material from them would have resulted in holes or depressions which would collect water.
- 3) In response to culvert installation issues:
  - a) The area was dry when the culverts were installed so they were not completely submerged at the time.
  - b) Mr. Berthiaume typically uses 24" diameter culverts on such roads since they are easier to clean out from beaver plugging. It so happens that slightly smaller (18" diameter) culverts were used on this project.
- 4) Of the 15 depth measurements taken by the county only one was measured at a 10' depth with most others less than or close to the 2 meter maximum – therefore, the majority of the wetland excavation was not 10' in depth as noted in the county's presentation.
- 5) Fabric was not used on the road bed since it is a shallow, peat wetland and not a deep, peat wetland where the use of fabric is recommended.
- 6) The county refers to many documents on the proper construction of forest roads in wetlands – those documents are merely guidelines and not the only way to accomplish constructing a proper forestry road through a wetland
- 7) Regarding the federal letters from the EPA and ACOE, those issues are separate (as this appeal is for a state law/ruling). Peter Swenson's (EPA) letter indicates the applicant should be given more time to show that the road was constructed properly and not in violation of any federal law (Clean Waters Act).
- 8) There were two letters received from MN DNR Forestry Division Director Dave Epperly – with only the first one being referenced. The second letter (dated 3/7/11) states that the DNR cannot take a position on the road's construction as no one from that agency has visited the site to gather any information to make such a determination.
- 9) 2/11/11 letter from Peter Swenson of the EPA states that they do not consider the road width a problem of any sort.
- 10) Finally, the BWSR order that required today's meeting asked for three things:
  - a) Answers of Findings of Fact
  - b) Experts to testify as to proper BMP's, and
  - c) To have a full recording of the hearing

Mr. DeCaigny's presentation has addressed the Findings of Fact point-by-point as the county had not done, and produced experts familiar with the BMP's, as they work with them every day.

The county had no such experienced witnesses testify as to proper BMP's.

Jack Ezell (board member who was not present at the November 29, 2010 Board of Adjustment meeting) asked where borrow material would come from if it's not available on-site.

Mr. Higgins responded that borrow typically is taken from as close to the site as possible, but in some instances may be hauled in from off-site.

Mr. Ezell stated that he had to fill in about 100' of wetland for his driveway around 10 years ago and that the fill did cost "a small fortune" but non-the-less made the project feasible.

Mr. Ostman stated that the guidelines have a section where the cost (of hauling in fill) of a project is a consideration so there is some flexibility built into the Wetland Conservation Act.

Mr. Suhonen stated both testimonials have dealt with water depth at great length and asked Dave Berthiaume what type of conditions he recalls experiencing on the site.

According to Berthiaume, initially there was no water present when the fill was removed for the road bed. However, the day following the excavating there was about 6" of water in the ditches (excavated area).

Wayne Brandt (Executive Vice-President of the MN Timber Producers Association) stated that working with the Wetland Conservation Act is complicated and involves several government agencies. There has been a lot of people spending a lot of time after-the-fact and very involved in a process to recreate what happened in the field many months/years prior.

There has been a lot of testimony heard today, some of which says that the road could have been built differently – which isn't necessarily a violation of the Wetland Conservation Act.

When the WCA was originally developed in 1991, there was no Forest Resource Council or guidelines or BMP's.

The WCA acknowledged that temporary and permanent forest roads for logging and other Silviculture activities certainly would have some impacts in wetland areas. Mr. Brandt and Gary Bishop (a retired logger) are two individuals from the forestry industry who worked on developing BMP's/guidelines for the forestry exemption in order to minimize such impacts.

Mr. Brandt stated that he wouldn't drive a 90,000 lb. truck or other heavy equipment on an improperly constructed road.

Today's decision comes down to judgments that were made and how they will be weighed.

On the one side are the people who are working in the forests (and wetlands) daily, actually building and driving heavy equipment on those roads to timber harvest sites.

The other side has folks who don't have a working knowledge (experience) of what is actually involved with road construction and operation of the various equipment to access timber sites.

Heather Cunningham (Carlton County Resource and Recycling Coordinator) wants to stress that 40% of the project (excavation area) could have been avoided by obtaining the fill material from upland areas on site. Also, Mr. Decaigny's uncle owns and operates more than one gravel pit in the county, so material could have been obtained off site as well.

You can throw out the BMP's and guideline documents, but you must read the rule and it states that you must limit impact; 40% of this project's impact could have been avoided, period.

Mr. Ostman (Angora, MN) stated that one problem with bringing in foreign materials into a site is that you may cause more siltation and introduction of non-native materials/vegetation into the wetland. It is always better to take/use material from the same site and that's important.

Also, a map in the county's presentation indicated an excellent on-site source of fill existed to the southeast (actually the east end of the wetland road). Construction of an access road would still be required to get to that site.

Chairman Suhonen stated that the board has received a lot of information on guidelines for proper wetland road construction and has been having a hard time knowing what they actually mean. Some of these guidelines are being considered as laws or rules and if that's the case, it should be stated that they are laws.

Mr. Krystosek (BWSR) stated that he fully recognizes the importance of the timber industry within the state, but to keep in mind the statute on road requirements is not optional. The BMP's and guidelines are vehicles to achieve those requirements.

The county's presentation is not a judgment on BMP's, but to show that there were other options available to avoid 40% of the project's impact.

With all testimony being completed, the public hearing was closed at 5:25 p.m. and the meeting reconvened at 5:45 p.m.

After a period of deliberation among the three acting board members, motion was made by Bruning, seconded by Ezell to deny the appeal based on justifications listed below, with Suhonen voting in support of approval of the appeal. Appeal denied.

**\*Justification\***

In considering the testimony and presentations made by all afforded opportunity at the March 9, 2011 Board of Adjustment meeting including considerable additional information from the November 29, 2010 meeting on the same matter;

The Carlton County Board of Adjustment agrees with the County's denial and agrees with the Technical Evaluation Panel's findings as listed and noted regarding Mr. DeCaigny's after-the-fact application for forest road exemption to the Minnesota Wetlands Conservation Act.

Meeting adjourned at 5:58 p.m.

Respectfully submitted,

Steve Bassa  
Recording Secretary

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