
Central Valley Regional Water Quality Control Board

26 July 2017

Stockton Delta Resorts, LLC
Tower Park Marina and Tower Park Village
14900 W Highway 12
Lodi, CA 95242

CERTIFIED MAIL
91 7199 9991 7035 8420 2364

NOTICE OF APPLICABILITY
GENERAL WASTE DISCHARGE REQUIREMENTS FOR
SMALL DOMESTIC WASTEWATER TREATMENT SYSTEMS
ORDER WQ 2014-0153-DWQ
FOR
STOCKTON DELTA RESORTS, LLC,
TOWER PARK MARINE AND TOWER PARK VILLAGE,
SAN JOAQUIN COUNTY

Stockton Delta Resorts, LLC submitted a Report of Waste Discharge (RWD) dated 1 June 2017 describing the Tower Park Marina and Village wastewater treatment plant (WWTP) in San Joaquin County. Additional information was submitted on 28 June 2017. Based on the provided information, the wastewater treatment system and discharge is consistent with the requirements of the State Water Resources Control Board (State Water Board) *General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems*, Order WQ 2014-0153-DWQ (General Order). This Notice of Applicability (NOA) provides notice that the General Order is applicable to the site as described below. You are hereby assigned Order WQ 2014-0153-DWQ-R5236 for the discharge. A copy of the General Order is enclosed and also available at:

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2014/wqo2014_0153_dwq.pdf

Please familiarize yourself with the entire General Order and its attachments, which describe mandatory discharge and monitoring requirements. The General Order contains operational and reporting requirements by wastewater system type. Sampling, monitoring, and reporting requirements applicable to your treatment and disposal methods must be completed in accordance with the appropriate treatment system sections of the General Order and the attached Monitoring and Reporting Program (MRP) 2014-0153-DWQ-R5236. The Discharger is responsible for all the applicable requirements that exist in the General Order and this NOA.

REGULATORY BACKGROUND

Wastewater discharge from Tower Park Marina and Village WWTP is currently regulated by Waste Discharge Requirements (WDR) Order 94-078, which was adopted on 25 March 1994. Now that the discharger is enrolled under the General Order, WDR Order 94-078 will be rescinded at an

upcoming meeting of the Central Valley Regional Water Board. Effective upon rescission of Order 94-078, the discharge shall be regulated pursuant to the General Order.

EXISTING FACILITY AND DISCHARGE DESCRIPTION

The Tower Park Marina and Village WWTP is owned and operated by Stockton Delta Resorts, LLC (hereafter "Discharger") and is located at 14900 West Highway 12 in San Joaquin County, as shown on Attachment A, which is attached hereto and is made part of this NOA by reference. The facility occupies assessor's parcel numbers 055-260-03, 055-260-04, 055-030-01, 055-030-09, and 055-030-13. The marina is located approximately six miles from the nearest municipal system at White Slough, which is owned and operated by the City of Lodi. The fees needed to connect to the City of Lodi's treatment facility are currently too costly for the Tower Park facility. Therefore, wastewater is collected and treated on-site. The site plan is shown on Attachment B and a wastewater flow schematic is shown on Attachment C, which are attached hereto and made part of this NOA by reference.

The wastewater treatment system collects wastewater generated from 200 manufactured homes in the Tower Park Village, the marina, and nearby campgrounds. Wastewater from recreational vehicles (RVs) is discharged to the treatment system, provided the RVs do not use formaldehyde-based products in their holding tanks, in accordance with Sections B.2.b and B.3.d of the General Order. If an RV has used these types of products, they are required to empty their tanks prior to connecting to the Discharger's treatment system. In addition, these requirements are described in the reservation and site map literature given to all RV guests.

The wastewater system consists of a WWTP, an aeration pond with a secondary unlined evaporation pond, two lift stations (LS1 and LS2), and a leachfield. Wastewater is pumped to the WWTP and/or the unlined aeration pond for disposal. Influent flows to the WWTP vary from 10,000 to 60,000 gallons per day (gpd). The service area at Tower Park is fully built out and not allowing any new water or sewer connections.

Between the two lift stations is a manually control valve that can direct wastewater to the WWTP or the aeration pond as needed to maintain freeboard in the aeration pond or to allow the leachfield additional drying time. Generally, wastewater collected during dry months (March through October) is directed to the WWTP, which consists of two activated sludge package treatment plants that provide a combined treatment capacity of 80,000 gpd. Pretreatment consists of primary clarification through grinder pumps to break up large objects and uses gravity to settle out solids. Floating debris that passes through the grinder is hand skimmed daily. The WWTP consists of two clarifiers, an aerobic reactor, stabilization tank, sand filter, and chlorination chamber. Sludge and solids are re-circulated back to the package plants. Chlorination is the final treatment stage prior to discharging to the leachfield.

The leachfield consist of approximately 3.3 acres and is divided into two sections. Effluent is applied to one area for a two week cycle and then to the other area for two weeks to allow for sufficient infiltration of the wastewater and to avoid ponding and other nuisances. Grasses grown on the leachfields are frequently mowed and occasionally disked.

During the winter or wet months, wastewater is generally discharged to the unlined aeration pond where it evaporates and percolates. During periods of heavy rainfall, the adjacent unlined evaporation pond is used to maintain two feet of freeboard in the aeration pond. Both ponds are located in the southern portion of the facility, approximately 110 to 150 feet west of Little Potato Slough, which may not meet the required setbacks included in the General Order (see Section B.1.1 below). Pond dimensions are shown below.

Pond	Surface Area ¹	Depth ¹	Capacity ²
Aeration Pond	3.5 acres	4 feet	4.5 MG
Evaporation Pond	2.5 acres	8 feet	6.5 MG

¹ Based on dimensions included in the RWD.

² Does not include two feet of freeboard

MG = million gallons

Wastewater samples are collected from the WWTP just before discharge to the land application area. Results for samples recently collected during dry and wet seasons are shown below.

Concentration			
Constituent	12/5/16	5/1/17	Units
BOD	21.3	9.64	mg/L
SC	670	773	µmhos/cm
Nitrate, Nitrogen	32.8	19.1	mg/L
TDS	430	560	mg/L

BOD = 5-day biochemical oxygen demand

mg/L = milligrams per liter

SC = specific conductance

TDS = total dissolved solids

µmhos/cm = micromhos per centimeter

Concentrations of constituents in samples collected from the aeration pond during dry and wet seasons are shown below.

Concentrations			
Constituent	12/5/16	5/1/17	Units
SC	649	728	umhos/cm
Nitrate, Nitrogen	3.2	0.9	mg/L
TDS	400	490	mg/L

Depths to groundwater beneath the facility range between 6 feet below ground surface (bgs) in the southern portion of the facility to 10 feet bgs in the northern portion. Groundwater is not currently monitored and there are no supply wells on site. Drinking water is supplied by Little Potato Slough Mutual Water Company.

SITE-SPECIFIC REQUIREMENTS AND EFFLUENT LIMITS

Note that the General Order contains prohibitions and specifications that apply to all wastewater treatment systems as well as those that only apply to specific treatment and/or disposal systems. The specific requirements and effluent limits for your treatment system are summarized below.

The wastewater treatment operator must be certified and familiar with the requirements contained in the General Order, this NOA, and the MRP.

Requirements by Wastewater System Type, Section B of General Order

B.1 All Wastewater Systems

This section applies in its entirety to the Tower Park Marina and Tower Park Village WWTP with the following site specific requirements.

B.1.a Effluent flow limits.

A flow meter is required to be installed prior to the wastewater discharging to the aeration pond. This meter will measure effluent from LS2 to the aeration pond (see Attachment 3 for the general location of the new flow meter).

Flow Effluent Limit as Monthly Average	
Effluent from WWTP to Leachfield	80,000 gpd
Effluent from LS2 to Aeration Pond ¹	80,000 gpd
TOTAL DAILY FLOW (daily flows to either the leachfield or ponds, or the total combined flow to the leachfield and the pond)	80,000 gpd

¹ Flow meter will be installed to monitor flows from LS2 to the aeration pond (see Attachment 3).

B.1.I Wastewater system setbacks.

This is an existing facility, constructed prior to the issuance of the new General Order for Small Domestic Wastewater Treatment Systems, and the wastewater ponds may not be compliant with the setbacks included in the General Order. However, this WWTP will still be permitted under this General Order provided that nuisance conditions do not result from noncompliance. Expansion of a noncomplying wastewater treatment system shall trigger further evaluation of the setbacks, as described in Section B.1.I of the General Order.

B.3 Aerobic Treatment Units

The WWTP utilizes an aerobic treatment unit; therefore this section applies in its entirety.

B.4 Activated Sludge Systems

The WWTP utilizes an activated sludge system; therefore this section applies in its entirety.

B.5 Pond Systems

The WWTP utilizes a pond system; therefore this section applies in its entirety.

B.6 Subsurface Disposal Systems

The WWTP utilizes a subsurface disposal system; therefore this section applies in its entirety.

B.7 Land Application and/or Recycled Water Systems

The WWTP utilizes a land application system; therefore this section applies in its entirety.

Effluent Limitations, Section D of General Order

This section applies in its entirety to the Tower Park Marina and Tower Park Village WWTP and shall include the following site specific limitations.

Aeration Pond Effluent Limitations

The following limits apply to effluent in the aeration pond.

Constituent	Units	Limit
BOD	mg/L	90

Wastewater Treatment Plant Effluent Limits

The following limits apply to effluent discharged to the land application area.

Constituent	Units	Limit
BOD	mg/L	30 (monthly average, 45 (7-day average)
TSS	mg/L	30 (monthly average, 45 (7-day average)

Effluent Limit Rationale

The treatment system is subject to technology performance effluent limits for the reduction of biochemical oxygen demand (BOD) as specified in the General Order.

Staff evaluated the need for a total nitrogen effluent limit using the method contained in the General Order. Over a typical year, concentrations of nitrate nitrogen in effluent samples from the WWTP range between 17 and 44 mg/L (data collected from May 2016 and April 2017). Nitrate loading rates to the LAA are low (less than 60 pounds per acre per year or 0.1 pounds per acre per day). There is approximately 10 feet of separation between groundwater and the LAA. Nitrate concentrations reported in wastewater samples collected from the aeration pond are low (average concentration of 5 mg/L in samples collected between May 2016 and April 2017) and therefore does not pose a risk to groundwater. Based on the above information, a nitrogen effluent limit is not necessary for this facility because there is an insignificant threat to groundwater due to the low concentrations of nitrate in the wastewater.

Technical Report Preparation Requirements, Provisions Section E.1 of General Order

The following technical reports shall be submitted as described below:

1. By **1 November 2017**, the Discharger shall submit a *Sampling and Analysis Plan* consistent with the requirements of General Order Provision E.1.b.

MONITORING AND REPORTING PROGRAM

The Discharger shall comply with MRP 2014-0153-DWQ-R5236, which is attached hereto and made part of this NOA by reference.

ENFORCEMENT

Please review this NOA carefully to ensure that it completely and accurately reflects the discharge. Discharge of wastes other than those described in this NOA is prohibited. Prior to allowing changes to the wastewater strength or generation rate, or to the method of waste disposal, you must contact the Central Valley Regional Water Board to determine if submittal of a RWD is required.

Stockton Delta Resorts, LLC will generate the waste subject to the terms and conditions of WQ 2014-0153-DWQ-R5236 and will maintain exclusive control over the discharge. As such, Stockton Delta Resorts, LLC is primarily responsible for compliance with this NOA, MRP, and General Order, with all attachments. Failure to comply with the requirements in the General Order or this NOA could result in an enforcement action as authorized by provisions of the California Water Code.

ANNUAL FEES

Staff has determined the discharge is a threat to water quality and complexity rating of 2-B. The annual fee corresponding to a threat to water quality and complexity of 2-B is currently \$14,929. The fee is due and payable on an annual basis until coverage under the General Order is formally rescinded. Please note that the annual fees are reviewed each year and may change. If the wastewater discharge ceases, you must provide written notice so that we can terminate coverage

under the General Order and no longer bill you.

DOCUMENT SUBMITTAL

All monitoring reports and other correspondence should be converted to searchable Portable Document Format (PDF) and submitted electronically. Documents that are less than 50 MB should be emailed to:

centralvalleysacramento@waterboards.ca.gov.

To ensure that your submittal is routed to the appropriate staff person, the following information should be included in the body of the email or any documentation submitted to the mailing address for this office:

Facility Name: Tower Park Marina and Tower Park Village WWTP, San Joaquin County		
Program: Non-15 Compliance	Order: 2014-0153-DWQ-R5236	CIWQS Place ID: 264829

Documents that are 50 MB or larger should be transferred to a CD, DVD, or flash drive and mailed to:

Central Valley Regional Water Quality Control Board
ECM Mailroom
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

Now that the Notice of Applicability has been issued, the Board's Compliance and Enforcement section will take over management of your case. Brendan Kenny is your new point of contact for any questions about the General Order. If you find it necessary to make a change to your permitted operations, Brendan will direct you to the appropriate Permitting staff. You may contact Brendan at (916) 464-4635 or at *bkenny@waterboards.ca.gov.*

--original signed by Andrew Altevogt for --

Pamela C. Creedon
Executive Officer

enc: Water Quality Order WQ 2014-0153-DWQ
Monitoring and Reporting Program 2014-0153-DWQ-R5236
Attachment A, Site Location Map
Attachment B, Site Plan
Attachment C, Wastewater Treatment System Schematic

cc w/out enc: Timothy O'Brien, State Water Resources Control Board, Sacramento
Rodney Estrada, San Joaquin County Environmental Health Department,
Stockton

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION

MONITORING AND REPORTING PROGRAM WQ 2014-0153-DWQ-R5236

FOR

STOCKTON DELTA RESORTS, LLC,
TOWER PARK MARINA AND TOWER PARK VILLAGE
SAN JOAQUIN COUNTY

This Monitoring and Reporting Program (MRP) describes requirements for monitoring a wastewater treatment system at the Tower Park Marina and Tower Park Village. This MRP is issued pursuant to Water Code section 13267. The Discharger shall not implement any changes to this MRP unless and until a revised MRP is issued by the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) or Executive Officer.

Water Code section 13267 states, in part:

“In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste within its region, or any citizen or domiciliary, or political agency or entity of this state who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge, waste outside of its region that could affect the quality of waters within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports.”

Water Code section 13268 states, in part:

“(a) Any person failing or refusing to furnish technical or monitoring program reports as required by subdivision (b) of section 13267, or failing or refusing to furnish a statement of compliance as required by subdivision (b) of section 13399.2, or falsifying any information provided therein, is guilty of a misdemeanor and may be liable civilly in accordance with subdivision (b).

(b)(1) Civil liability may be administratively imposed by a regional board in accordance with article 2.5 (commencing with section 13323) of chapter 5 for a violation of subdivision (a) in an amount which shall not exceed one thousand dollars (\$1,000) for each day in which the violation occurs.”

Stockton Delta Resorts, LLC owns and operates the wastewater system that is subject to the Notice of Applicability (NOA) of Water Quality Order 2014-0153-DWQ-R55236. The reports are necessary to ensure that the Discharger complies with the NOA and General Order. Pursuant to Water Code section 13267, the Discharger shall implement this MRP and submit the monitoring reports described herein.

All samples shall be representative of the volume and nature of the discharge or matrix of material sampled. The name of the sampler, sample type (grab or composite), time, date, location, bottle type, and any preservative used for each sample shall be recorded on the sample chain of custody form. The chain of custody form must also contain all custody information including date, time, and to whom samples were relinquished. If composite samples are collected, the basis for sampling (time or flow weighted) shall be approved by Central Valley Water Board staff.

Field test instruments (such as those used to test pH, dissolved oxygen, and electrical conductivity) may be used provided that they are used by a State Water Resources Control Board, Environmental Laboratory Accreditation Program certified laboratory, or:

1. The user is trained in proper use and maintenance of the instruments;
2. The instruments are field calibrated prior to monitoring events at the frequency recommended by the manufacturer;
3. Instruments are serviced and/or calibrated by the manufacturer at the recommended frequency; and
4. Field calibration reports are maintained and available for at least three years.

INFLUENT FLOW MONITORING

Influent flow shall be monitored at the locations shown in Attachment C as specified below:

Parameter	Units	Type of Sample	Monitoring Frequency	Reporting Frequency
Average Daily Influent Flow	MGD	Meter Observation	Daily	Quarterly

EFFLUENT MONITORING

Effluent samples shall be collected from the aeration pond and from the WWTP effluent prior to discharge to the LAA. A grab sample from aeration pond will be considered representative of the effluent. At a minimum, the Discharger shall monitor effluent as specified below:

Parameter	Units	Type of Sample	Monitoring Frequency	Reporting Frequency
BOD ₅ ¹	mg/L	Grab	Monthly	Quarterly
TSS	mg/L	Grab	Monthly	Quarterly

Parameter	Units	Type of Sample	Monitoring Frequency	Reporting Frequency
Total Nitrogen	mg/L	Grab	Monthly	Quarterly

¹ 5-day Biochemical Oxygen Demand.

POND MONITORING

The Discharger shall monitor each pond (the aeration pond and the evaporation pond) as specified below.

Parameter	Units	Type of Sample	Monitoring Frequency	Reporting Frequency
Freeboard ¹	0.1 feet	Staff Gage	Weekly	Quarterly
Levee Condition	--	Observation	Weekly	Quarterly
Seepage ²	--	Observation	Weekly	Quarterly
Odors	--	Observation	Weekly	Quarterly
Dissolved Oxygen ³	mg/L	Grab	Monthly	Quarterly

¹ Freeboard shall be measured vertically from the surface of the pond water to the lowest elevation of the surrounding berm and shall be measured to the nearest 0.1 feet.

² Pond containment berms shall be observed for signs of seepage or surfacing water along the exterior toe. If surfacing water is found, then a sample shall be collected and tested for total coliform organisms and total dissolved solids.

³ Dissolved oxygen shall be monitored at each pond that contains at least one foot of standing water. The report shall state how much water was in the pond if dissolved oxygen was not monitored. Samples shall be collected opposite the pond inlet at a depth of one foot.

LEACH FIELD AREA

Monitoring shall be sufficient to determine if wastewater is evenly applied, the disposal area is not saturated, burrowing animals are not present, plant roots have not compromised the disposal area, and odors are not present. Inspection of dosing pump controllers, automatic distribution valves, etc. is required to maintain optimum treatment in the dripfield area. Monitoring shall include, at a minimum, the following:

Parameter	Inspection Frequency	Reporting Frequency
Pump Controllers, Automatic Valves, etc. ¹	Quarterly	Quarterly
Nuisance Odor Condition	Quarterly	Quarterly
Saturated Soil Conditions ²	Quarterly	Quarterly
Plant Growth ³	Quarterly	Quarterly
Vectors or Animal Burrowing ⁴	Quarterly	Quarterly

1. All pump controllers and automatic distribution valves shall be inspected for proper operation as recommended by the manufacturer.

2. Inspect a disposal area for saturated conditions.

3. Shallow-rooted plants are generally desirable, deep-rooted plants such as trees shall be removed as necessary.

4. Evidence of animals burrowing shall be immediately investigated and burrowing animal populations controlled as necessary.

RECREATIONAL VEHICLE DISCHARGE MONITORING

Any wastewater system that has accepted recreational vehicle, portable toilet, or similar waste in the previous 12 months shall perform the following additional monitoring. Samples shall be collected to characterize effluent that is stored in wastewater ponds or that will be applied to a disposal area. Wastewater shall be monitored as specified below:

<u>Constituent</u>	<u>Units</u>	<u>Sample Type</u>	<u>Sample Frequency</u>	<u>Reporting Frequency</u>
Zinc	mg/L	Grab	Quarterly	Quarterly
Phenol	mg/L	Grab	Quarterly	Quarterly
Formaldehyde	mg/L	Grab	Quarterly	Quarterly

SOLIDS DISPOSAL MONITORING

The Discharger shall report the handling and disposal of all solids (e.g., screenings, grit, sludge, biosolids, etc.) generated at the wastewater system. Records shall include the name/contact information for the hauling company, the type and amount of waste transported, the date removed from the wastewater system, the disposal facility name and address, and copies of analytical data required by the entity accepting the waste. These records shall be submitted as part of the annual monitoring report.

REPORTING

All monitoring reports should be converted to a searchable Portable Document Format (PDF) and submitted electronically. Documents that are less than 50MB should be emailed to: centralvalleysacramento@waterboards.ca.gov.

Documents that are 50 MB or larger should be transferred to a CD, DVD, or flash drive and mailed to the following address:

Central Valley Regional Water Quality Control Board
ECM Mailroom
11020 Sun Center Drive, Suite 200
Rancho Cordova, California 95670

To ensure that your submittal is routed to the appropriate staff person, the following information should be included in the body of the email or transmittal sheet:

Attention: Compliance/Enforcement Section
Stockton Delta Resorts, LLC
Tower Park Marina and Tower Park Village
San Joaquin County
Place ID: 264829

In reporting monitoring data, the Discharger shall arrange the data in tabular form so that the date, sample type (e.g., effluent, solids, etc.), and reported analytical or visual inspection results are readily discernible. The data shall be summarized to clearly illustrate compliance with the General Order and NOA as applicable. The results of any monitoring done more frequently than required at the locations specified in the MRP shall be reported in the next regularly scheduled monitoring report and shall be included in calculations as appropriate.

Monitoring information shall include the method detection limit (MDL) and the Reporting limit (RL) or practical quantitation limit (PQL). If the regulatory limit for a given constituent is less than the RL (or PQL), then any analytical results for that constituent that are below the RL (or PQL) but above the MDL shall be reported and flagged as estimated. For a Discharger conducting any of its own analyses, reports must be signed and certified by the chief of the laboratory.

A. Quarterly Monitoring Reports

Quarterly reports shall be submitted to the Regional Water Board on the **first day of the second month after the quarter ends** (e.g., the January-March Quarterly Report is due by May 1st). The reports shall bear the certification and signature of the Discharger's authorized representative. At a minimum, the quarterly reports shall include:

1. Results of all required quarterly monitoring. Data shall be organized by the associated monitoring sections (e.g., Flow Monitoring, Effluent Monitoring, etc.) and presented in tabular format.
2. A comparison of monitoring data to the discharge specifications, flow limit, and effluent limits.
3. A disclosure of any violations of the NOA and/or General Order requirements and an explanation of corrective actions.
4. If requested by staff, copies of laboratory analytical report(s) and chain of custody form(s).

B. Annual Report

Annual Reports shall be submitted to the Regional Water Board by **February 1st following the monitoring year**. The Annual Report shall include the following:

1. Tabular and graphical summaries of all monitoring data collected during the year.
2. An evaluation of the performance of the wastewater treatment system, including discussion of capacity issues, nuisance conditions, system problems, and a forecast of the flows anticipated in the next year. A flow rate evaluation, as described in the General Order (Provision E.2.c), shall also be submitted if required.
3. A discussion of compliance and the corrective action taken, as well as any planned or proposed actions needed to bring the discharge into compliance with the NOA and/or General Order.

4. A discussion of any data gaps and potential deficiencies/redundancies in the monitoring system or reporting program.
5. The name and contact information for the wastewater operator responsible for operation, maintenance, and system monitoring.

A letter transmitting the monitoring reports shall accompany each report. The letter shall report violations found during the reporting period, and actions taken or planned to correct the violations and prevent future violations. The transmittal letter shall contain the following penalty of perjury statement and shall be signed by the Discharger or the Discharger's authorized agent:

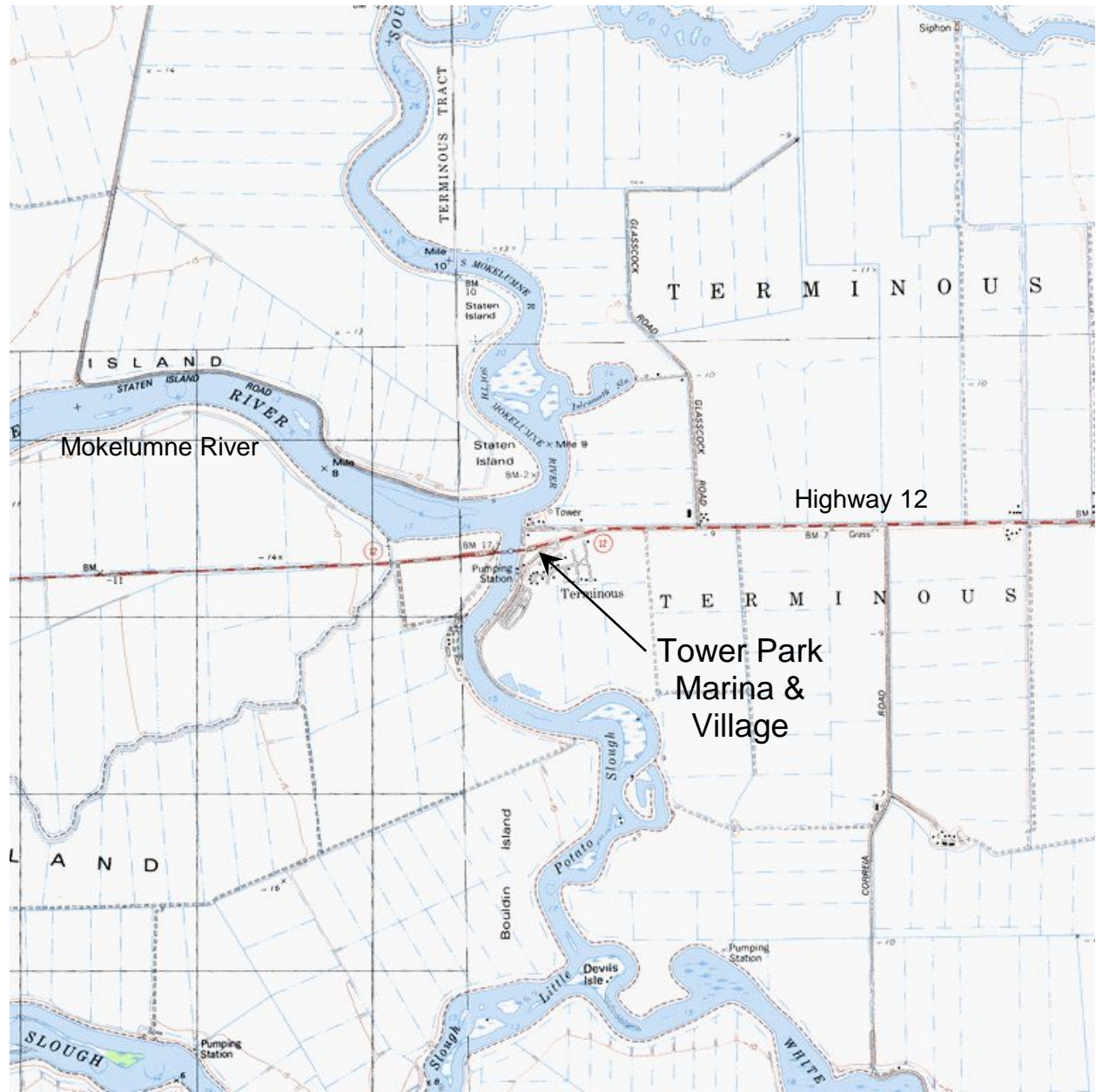
"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of the those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

The Discharger shall implement the above monitoring program as of the date of this MRP.

Ordered by:

PAMELA C. CREEDON, Executive Officer

DATE



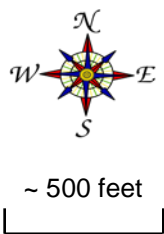
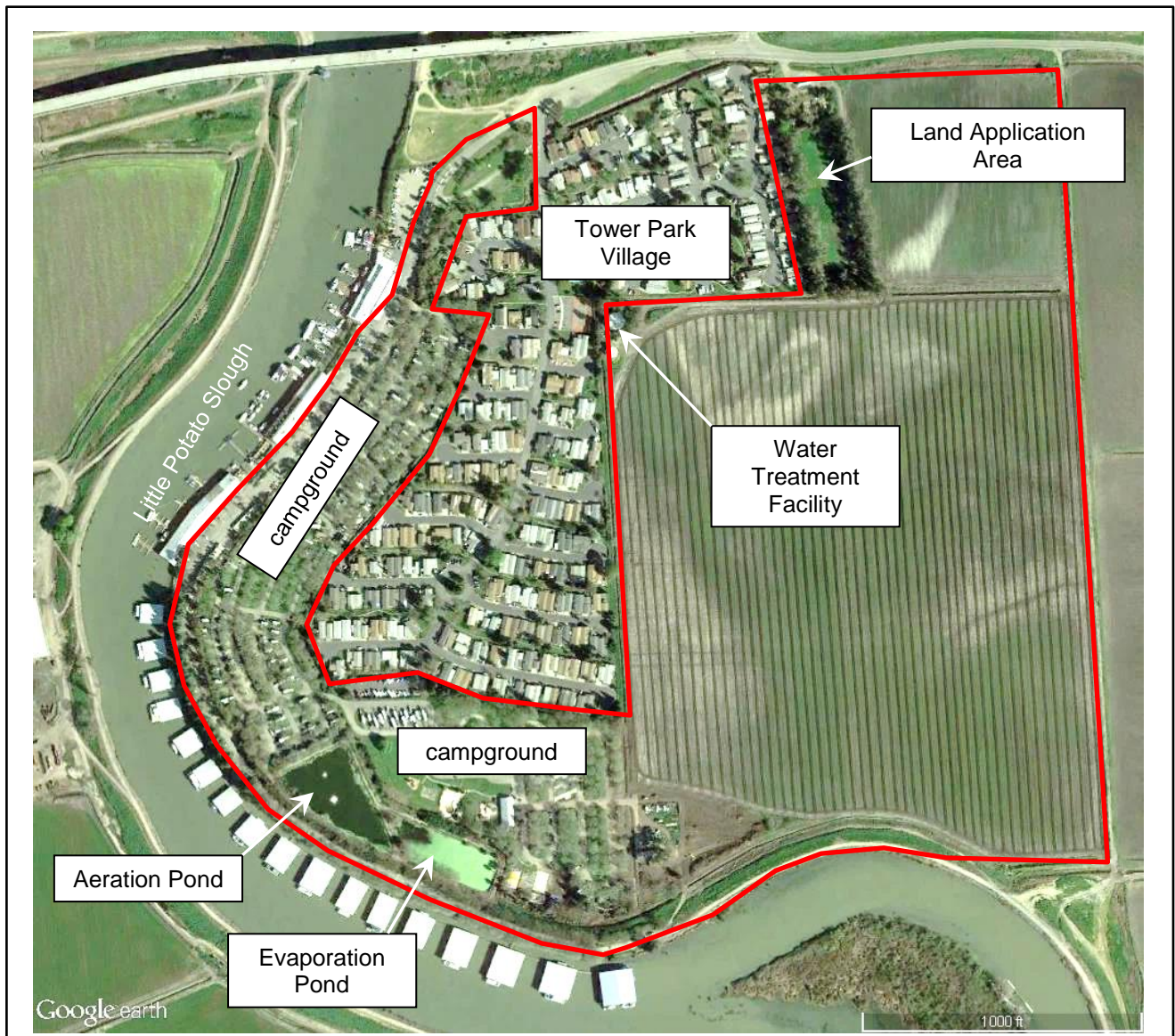
~ 0.5 miles

SITE LOCATION MAP

**TOWER PARK MARINA
AND
TOWER PARK VILLAGE**

**SAN JOAQUIN
COUNTY**

Source:
U.S.G.S. Topographic Map



Source:
Google Earth, 2017 and RWD, 2017

SITE PLAN

**TOWER PARK MARINA
AND
TOWER PARK VILLAGE**

SAN JOAQUIN COUNTY

