Delta Methylmercury (MeHg) Total Maximum Daily Load (TMDL) and Basin Plan Amendment

Stakeholder Informational Meeting
Draft Meeting Summary

MEETING DATE: August 13, 2009

LOCATION: Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, Ca

ATTENDEES: See attachment

ACTION ITEMS

1. Central Valley Regional Water Quality Control Board (Water Board) Staff will prepare a white paper which explains landowners' responsibility for water quality conditions that result from changes to water properties as it crosses over and through said lands.
2. Water Board staff will continue to try and balance long-term stringent goals, with shorter term interim goals that may not be as restrictive as the long term goals but will allow near term compliance by dischargers and future increased requirements.

MEETING SUMMARY

Welcome and Introductions

Dave Ceppos, Center for Collaborative Policy (CCP) facilitator, opened the meeting and thanked the Stakeholders who had submitted comments on the July 27th version of the Basin Plan Assessment (BPA) (see Delta MeHg TMDL website for complete set of stakeholder comments - http://www.swrcb.ca.gov/rwqcb5/water_issues/tmdl/central_valley_projects/delta_hg/stakeholder_meetings/index.shtml). Mr. Ceppos explained that the comments were put into two categories by CCP and Water Board Staff (Staff): category 1 consisted of comments that were considered to be editorial and generally easy to address, and category 2 consisted of comments that represented differences of opinion and would likely require focused discussion by stakeholders.

Mr. Ceppos explained that historically the Delta MeHg Stakeholders and interested parties had been frustrated because they were only having dialogue with Staff and not with each other. He mentioned that the Stakeholder Group has had technical and general informational discussions, but that this meeting would be the first time the full Stakeholder Group would have the opportunity to review and comment on the same document during a Stakeholder Group meeting. Mr. Ceppos stressed that more often than not, he was going to be directing Stakeholder questions and comments to each other rather than just to the Staff. He then asked the Stakeholder Group to agree to only ask each other questions of clarification, and to exhibit non judgmental behavior towards one another. The Stakeholder Group agreed.

Mr. Ceppos promoted the idea of focusing on the category 2 items first. The Stakeholder Group agreed with his proposal.

Mr. Ceppos described that he would try to move differing Stakeholders towards a mutually beneficial resolution. He explained that ultimately Staff will make recommendations to the Water Board if the Stakeholder Group can not come to agreement. Self introductions followed.

Review Comments on the July 27 BPA

The following discussion of BPA comments is organized by BPA paragraph number.

Row 2: *The following fish tissue objectives apply to the Sacramento-San Joaquin Delta and Yolo Bypass waterways listed in Appendix 43. The average methylmercury concentrations shall no exceed 0.08 and 0.24 mg methylmercury/kg, wet weight, in muscle tissue of trophic level 3 and 4 fish, respectively (150-500 mm total length). These objectives are protective of (a) humans eating 32 g/day of commonly consumed, large fish; and (b) all wildlife species that consume large fish. The average methylmercury concentrations shall not exceed 0.03 mg methylmercury/kg, wet weight, in whole fish less than 50 mm in length. This objective is protective of wildlife species that consume small fish.*

Stakeholder Comment: The Clean Water Action point of view is that the Water Board has received many letters from community groups expressing that the proposed fish tissue objectives were inadequate because community members eat more than one meal of fish per week from the Delta. In the streamlined version of the BPA the fish tissue objectives options are not laid out like they were in the original BPA. Water Board Staff needs to set a basic fish tissue objective goal for the TMDL that is more conservative than what is being proposed and in line with the actual numbers of fish being eaten in the Delta.

CCP Response: Are the conservative consumption rates you identified based on a scientifically derived number?

Stakeholder Response: The conservative consumption rate was one of the options presented in the original TMDL and laid out by Water Board Staff; however, it was not the option they recommended. The conservative consumption option would be closer to fishing practices and actual consumption rates in the Delta.

CCP Question to Water Board Staff: Was there data to support the consumption rate preferred by Water Board Staff?

Water Board Staff Response: There is no scientific basis for picking a certain fish tissue objective. The options presented in the February 2008 BPA will still be in the current version; Water Board Staff has not taken anything away.
Stakeholder Comment: Clean Water Action is looking to represent what has been heard from communities dependant on the fish from the Delta.

CCP Response: Would Clean Water Action expect target consumption rates to begin right away or would the rates go into effect slowly?

Stakeholder Response: Clean Water Action is advocating for the more stringent concentration level. Clean Water Action does not think it is possible to get there tomorrow, but want to move in that direction.

Stakeholder Comment: Is the conservative target realistic or practical? The more conservative rate is a more ideal target, but given the current situation a more practical approach would be better. The problem of MeHg in the Delta is that it is not going to be solved anytime soon.

Water Board Staff Response: The Porter-Cologne Water Quality Control Act (Porter-Cologne) requires the Water Board to evaluate the reasonability of each option proposed in the BPA. The topic of reasonability was discussed at length during the scientific educational portion of a past Stakeholder meeting. One way Staff has considered reasonableness was to look at a variety of fish across the western United States.

Stakeholder Comment: It is premature to pick the most conservative consumption level before knowing what the solutions will be.

Stakeholder Comment: Going back to what the U.S. EPA said at a past Stakeholder Group meeting; it is not known what can be achieved in regards to getting MeHg out of the Delta system. Conducting studies will move everyone towards understanding how to control the system more effectively. All Stakeholders have the same goal; to decrease the amount of MeHg in the Delta. Simply telling people to stop eating fish does not work. Prefer the more conservative approach now because it is not reasonable to expect that Stakeholders will transition to a more conservative level in twenty years.

CCP Question to Water Board Staff: The average do-not-exceed concentration level refers to all Delta sub-regions. Is it possible to create different fish tissue objectives for the sub areas in the TMDL?

Water Board Staff Response: Yes, creating different fish tissue objectives for the sub-areas is a possibility. When Staff relooks at the TMDL in the future they will reconsider the concentration numbers. There is nothing in the TMDL that says that the amounts can not be changed; it is an adaptable TMDL process. Staff realize the fish tissue objective levels are high, and are looking for ways to reduce them.

CCP Comment: How does this Stakeholder Group ensure that the reopener is in place?

Water Board Staff Response: Reopener language is already in the BPAand should be included in the proposed Memorandum ofIntent, committing the Water Board to come back and reevaluate the numbers in the future.

Stakeholder Comment: This process of selecting a fish consumption level is similar to drinking water. For example, drinking water has an arsenic level goal that is different than what is

required. If the Stakeholder Community finds out that it is a lot easier to reduce MeHg levels in the Delta than originally thought, Stakeholders would revise the goal accordingly.

Stakeholder Comment: This Stakeholder Group is discussing a public health issue. Some recent articles have indicated that mercury may or may not be as damaging as originally thought. The health safety levels will be set by the public health agencies / committees.

CCP Question: Can Stakeholders live with the following conceptual proposal: the Water Board agrees to an adaptive approach and commits to a series of long range stringent goals and short-term actions in the next iteration of the BPA.

Stakeholder Response: Community groups that have high levels of fishing will not likely support the proposal. Not sure what the capacity of these groups would be to come before the Stakeholder Group and express their views.

CCP Comment: The Water Board appears to be moving towards control if not reduction of MeHg in the Delta. What is the objective of pushing forward a fish tissue objective level that can not be achieved in the short term?

Stakeholder Response: Do not agree that the conservative fish tissue objective level cannot be met. Agree to consider the conceptual proposal to put the reopener guarantee in the BPA.

Stakeholder Comment: Need to consider Porter-Cologne and what is considered reasonable.

Stakeholder Comment: This is an adaptable TMDL, therefore what can and can not be done will be discovered in Phase 1. Setting a goal that Stakeholders can obtain is a good approach in the interim. Unreachable goals discourage people from action.

Stakeholder Comment: We can support the conceptual reopener proposal. And we recognize that it will take years to lower MeHg levels in the Delta.

Stakeholder Comment: If the goal is unachievable, the Water Board will go into an oversight mode. This Stakeholder Group should not put an objective in the BPA that is unachievable.

Water Board Staff Response: The proposed number is being achieved in the Central Delta, therefore, Water Board Staff does not feel it is unachievable.

CCP Comment: There are a lot of dischargers in the room and not a lot of Environmental Justice groups / community members. Propose crafting a both/and solution that sets long range goals and short term conditions that meet Porter-Cologne requirements.

Water Board Staff Response: Crafting the proposed both/and solution text is a homework assignment for Water Board Staff.

Stakeholder Comment: A more robust public health advisory program would be advisable.

Row 4: Load and Waste Load Allocations was not specifically discussed under Row 4 but was covered in other portions of the Stakeholder meeting.

Row 11: Implementation Program
Additional information is needed on the ability to control mercury and methylmercury sources in order to attain load and waste load allocations. As a result, the Delta Mercury Control Program is implemented through a phased, adaptive approach. Phase 1 spans from [the effective date of this amendment] to 2017 [the Delta Mercury Control Program Review date] and includes a study period to develop and evaluate management practices to control mercury and methylmercury. Phase 2 (after Delta Mercury Control Program Review) requires implementation of management practices after the Regional Water Board reviews the Delta Mercury Control Program.

CCP Comment: A variety of Stakeholders submitted comments on row 11.

Water Board Staff Response: Staff created the following Implementation Plan alternatives:

General Requirements for All Sources:
Inorganic mercury limit alternatives:
A1. All point and non-point sources in the Delta and Yolo Bypass shall not increase their inorganic mercury loads.
A2. All point sources in the Delta and Yolo Bypass (Table B) shall not increase their inorganic mercury loads.
A3. (No inorganic mercury limits for any source)

Alternative:
During the first eight years following adoption of the BPA (Phase 1), dischargers shall reduce total mercury and methylmercury levels using available methods, including pollutant minimization programs, operational upgrades, and treatment process enhancements.

Stakeholder Comment: What is a reasonable level of MeHg reduction and what is the time period that implementation needs to take place? It is unclear what the implementation method is. It is unreasonable to be looking at DWR's particular discharge. There is not enough clarity to provide an implementation structure.

Water Board Staff Response: Staff will look at the study period to figure out what implementation methods make sense to reduce MeHg.

Stakeholder Comment: The BPA states that dischargers have to implement Pollution Minimization Plans (PMPs) within six months of receiving a permit. The PMPs should make a reduction in the MeHg levels.

Stakeholder Comment: We support caps being placed on total mercury as a part of Phase one. However we are against putting caps on MeHg during Phase one due to limited information and a potential impact on projects such as recycled water.

Stakeholder Comment: Do not want to implement something that may not work, the goal is to protect the environment and not take chances. Controlling methylation may not be a solution now.

Stakeholder Comment: U.S. EPA recommends additional interim limits, control measures, studies, and pilot projects to control mercury and MeHg.

Stakeholder Comment: Upstream actions are important. It is risky to make modifications without knowing what others are doing.

Stakeholder Response: The risk and uncertainty is the reason to do the studies.

Stakeholder Comment: Conducting PMPs will do more to reduce total mercury than it will to reduce MeHg.

Row 14: Placeholder for Urban Runoff

Urban runoff: For interim requirements, MS4 dischargers listed in Table C shall implement best management practices to the maximum extent practicable to control erosion and sediment discharges containing mercury. The Sacramento MS4 (CAS082597), Stockton MS4 (CAS083470), and Tracy MS4 (CAS000004) permittees shall implement pollution prevention measures and best management practices to the maximum extent practicable to minimize total mercury discharges. These MS4s shall submit a mercury plan by [one year after the effective date of this Basin Plan amendment] for Executive Officer approval. The mercury plan shall include a description of the discharger's existing mercury control efforts, a description of all mercury sources contributing, or potentially contributing, to the mercury loading in MS4 discharges, and an analysis of potential prevention and control actions that could minimize mercury loading.

Stakeholder Comment: Is there a way to add specific text for MS-4s?

Stakeholder Comment: The BPA should reference Guiding Principle number 5 in the Row 14 paragraph.

Water Board Staff Comment: New permits require PMPs and total mercury caps. Staff is looking for incentive examples for reducing MeHg loading.
Stakeholder Comment: Facilities should not be penalized if a new approach was tried and did not end up reducing MeHg.

Stakeholder Comment: If I were a POTW I would not invest capital in something if I did not have some assurance from the Water Board that they would not hold the discharger to a different standard in the future.

Stakeholder Comment: One idea that could have a "both/and" outcome rather than and either or outcome would be to have a phased adaptive approach and do control studies. Essentially what the Stakeholder Group is currently trying to design / advise on.

Lunch Break

Row 11: Implementation Program Continued

Stakeholder Comment: Need to conduct control studies before being able to implement a program. MeHg is not well understood and is not as simple to control as total mercury.

Stakeholder Comment: There is more data than on MeHg then this Stakeholder Group would like to admit. There are treatment plans that deal with MeHg. Should try to deal with total mercury first and then learn more about MeHg. Should be meeting waste load allocations starting on day one. Clean Water Action is willing to accept an eight year study period as long as mercury is being addressed.

Stakeholder Comment: DWR is not coming into this process like a POTW but rather has a wider range of issues.

Stakeholder Comment: The PMP is usually developed by the discharger. Enforcement typically monitors how well the discharger is following their plan, rather than how the discharger is reducing quantities of the constituent by a certain amount.

Stakeholder Comment: This implementation program should apply to all Stakeholder Groups. POTW's are a very small percentage of the total amount of MeHg.

Water Board Staff Comment: There are only a limited number of total mercury sources in the Delta. The Water Board needs to reduce the amount of contaminated sediment moving into the system.

Stakeholder Comment: There are several ways to deal with mercury; one approach would be to address total mercury levels while another approach would be to try to stop the methylation process. The overall goal of both approaches is the same. The Cache Creek Settling Basin is not a source of mercury; it is catching mercury, settling it out and reducing the amount going into the Delta.

Stakeholder Question: Have the water treatment plants that have implemented a PMP seen a reduction in mercury levels?

Water Board Staff Response: There have been big reductions in Sacramento Sanitation District's effluent however; there can be other factors that affect effluent.

Stakeholder Comment: There are dischargers that are not yet participating in this Stakeholder Process and need to be. More explicit waste load allocations should be assigned to agricultural interests.

CCP Question to the Water Board Staff: How does the Water Board expect to identify total mercury reduction?

Water Board Staff Response: Staff have created a mass balance of the Delta which will be used to measure and monitor mercury levels over the next 20 years.

CCP Question to the Water Board Staff: Does Staff have a methodology to measure total mercury reductions?

Water Board Staff Response: Water Board Staff is considering a hybrid of Alternative 1 and Alternative 2 (See page 6 of this Meeting Summary). All point sources and non point sources in the Delta should implement Best Management Practices (BMP). Water treatment plants will continue to create PMPs.

Water Board Staff Response: There are major inputs of mercury coming into the Delta.; Staff have estimated that approximately 400 kilos a year enter the Delta. There is a need to reduce the incoming load by 100kilos per year. Cache Creek alone contributes 150 kilos.

Stakeholder Response: The Cache Creek Settling Basin actually reduces the total mercury coming in to the Delta System by 150 kilos. Using BMPs for point source reduction might work on the project level, but when you include the entire Sacramento River system you can not stop erosion from coming into the system.

Stakeholder Comment: Public safety must be paramount. The control studies need to get done before funding can be acquired.

CCP Comment: Seem to keep coming back to whether reopeners are going to be effective enough. Stakeholders need to memorialize intent.

Stakeholder Comment: Regarding the idea of a BMP, DWR has responsibilities throughout California. These BMPs would impact DWR by an extraordinarily large amount. The way the open water requirement reads, it will trigger a TMDL for DWR to control sediment loading in the Delta. It is impossible for DWR to control sediment for the entire Sierras. DWR supports the idea of controlling mercury, but really has an issue with being held responsible for sediment.

Water Board Staff Response: Maybe the BMP is to work with the dam operators to keep sediment from coming down into the Delta.

CCP Comment: CCP has been communicating with the DWR Executive Officer regarding the need for the State and Federal agencies (that will be assigned allocations) to hold policy-level discussions among agency leaders. It is currently being elevated to Cal EPA and the Resources Agency to come up with a strategic game plan.

Stakeholder Comment: Any project is going to have to go through CEQA review which unto itself requires a review of potential impacts.

Row 13: WWTPs Requirements
Interim Limit Alternatives:

B1. No interim limits for methylmercury. BPA to contain interim limits for inorganic mercury based on current facility performance. The 12-month running average effluent total recoverable mercury loading shall not exceed XX lbs/month as an interim mass limit. The interim mass limit is to be derived using current, representative data as follows: XX lbs/month = 99.9th percentile running annual average THg load. The limitations will be re-evaluated each permit renewal.

B2. BPA to contain interim limits for methylmercury. BPA to contain interim limits for mercury, see B1.

Other Alternatives:
"Unassigned allocations for new discharges" The permittee shall be required to first evaluate whether it is possible for growth to occur without exceeding its WLA (i.e., whether it would be possible to offset growth through more effective source or treatment control) before disbursement of unassigned allocations.

Water Board Staff Comment: Within six months of approval, all facilities would implement a PMP. Should B1 and B2 be based on total mercury or MeHg? (see above) Staff suggested moving this topic to an upcoming Workgroup meeting for more focused discussions

Row 17: Mercury Control Studies
Point and nonpoint source dischargers shall conduct mercury and methylmercury control studies (Control Studies) to develop and evaluate management practices to control mercury and methylmercury discharges. The Control Studies final report shall include a description of methylmercury and/or mercury control methods; an evaluation of the effectiveness, costs, and potential environmental effects of identified control actions; and proposed implementation activities and schedules to comply with methylmercury allocations.

Stakeholder Comment: DWR appreciates that Staff are focusing on open water; it touches on a large extent what DWR does. If the responsibilities placed on DWR by the Water Board interfere with other responsibilities then DWR will have a problem.

Water Board Staff Comment: Do the DWR mandates trump the California Environmental Quality Act (CEQA)?

Stakeholder Response: No, nothing trumps CEQA however; CEQA allows forstatements of overriding considerations.

Water Board Staff Comment: Even if this TMDL was not here, DWR would still trigger CEQA issues.

Stakeholder Comment: There is a broad context here. There has to be a balancing of public interest.

Stakeholder Comment: This group is talking about high levels of State government, but the TMDL is being driven by the U.S. EPA at the Federal level. Need more Federal representation in the Stakeholder process.

Stakeholder Comment: Should an agency that has existing facilities whose intent is to use water for multiple uses be held to the same standard?

CCP Response: Please ask that question to the POTW and MS4 representatives.

Stakeholder Response: There has to be a balance in terms of competing beneficial uses. What California Fish and Game does with wetlands and what POTW's are going to be asked to do will have a small impact on the total amount of MeHg because they are both such small contributors. There is competition between the people who have to bill their water customers every month and people who want to eat fish from the Delta.

Stakeholder Comment: Can the Endangered Species Act (ESA) trump MeHg and the Clean Water Act?

Stakeholder Comment: Will the mercury held back by the Cache Creek Settling Basin be deducted from DWR's allocation amount? Will flood plains need an allocation?

Water Board Staff Response: Everybody in this Stakeholder process works for an agency that provides a very valuable public service. Everybody is in this together. The allocations in the TMDL are calculated for a normal dry period. Flood plains would be part of the open water allocation.

Stakeholder Comment: Noted that earlier version of the BPA described characterization and control as equal goals, and this version dropped the characterization.

Water Board Staff Response: Need to come to group consensus on what Characterization means. Staff put the need for characterization studies in the BPA. Staff considered embedding the word characterization into control study design.

Stakeholder Comment: Prefers the former description. Never argued that wetlands can be hotspots; just needed a greater understanding of the methylation process.

Stakeholder Comment: If you want to understand the science of mercury fully, it would take multiple years and millions of dollars.

Stakeholder Comment: Each water treatment plant is unique, and deals with unique issues. A single approach will not be sufficient.

Water Board Staff Response: Is seven years enough time to conduct the necessary Phase 1 studies?

Stakeholder Response: Water treatment plant operators are going to have much more knowledge in seven years than they have now.

Water Board Staff Comment: The requirements for Cache Creek are different than those for other dischargers.

Stakeholder Comment: I'm concerned about the requirement that after three years Stakeholders have to come back and report on the progress made and suggest any additional studies that would be needed. Concerned that a lot of studies have already been done, take a long time to complete, and could be conflicting with other studies. Not sure how much conclusive useful information will be gathered during this time.

Water Board Staff Response: When Staff first came up with the seven years time period, it began with four years and then went up to seven. The question is does the Water Board have text in the BPA that clearly states that the Water Board will review the progress being made and if good faith efforts are being done but studies are not completed, then more time could be allowed.

Stakeholder Comment: I am hearing what is heard during most regulatory processes. The truth of the matter is nobody will ever know everything; but that can not keep this process from moving forward. This TMDL should have been done a long time ago. Want to talk about what can be done to get funding so Stakeholders do not sit and wait to begin implementing projects.

Stakeholder Comment: A lot of the challenge is the source of mercury and obligation to clean it up. Need information about how airborne mercury ends up in water. This disconnect has continued to not get resolved.

CCP Response: Recall that John Bishop stated if water moves through your land and the properties of that water change into a discharger, the landowner becomes responsible.

Stakeholder Comment: Has there been a multi agency effort (i.e. California Air, and Water Boards Collaborating) to analyze MeHg?

Water Board Staff Response: As part of the mass balance Staff tried to balance out the atmospheric deposition coming in to the Delta. One of the major concerns is that California could get deposition from China that could override the improvements the Water Board is seeking to create.

Stakeholder Comment: As the BPA is written now, DWR could not comply with the 75% reduction asked of the Cache Creek Settling Basin within seven years.

Stakeholder Comment: Once language in the BPA is memorialized it becomes hard to change. Recommend putting conditions that need to be flexible in the Implementation Plan instead.

Row 43:
For development projects requiring Clean Water Act Section 404 permits that involve compensatory and/or mitigation wetlands, the USACE, U.S. Fish and Wildlife Service, National Oceanic and Atmospheric Administration (NOAA) Fisheries, and California Department of Fish and Game shall ensure that replacement wetland projects comply with the subarea allocations for wetlands in the Delta and Yolo Bypass.

Stakeholder Comment: What is meant by the word “ensure”? It is not the job of California Department of Fish and Game (DFG) to ensure regulatory compliance.

Stakeholder Comment: Obviously the regulatory responsibility is with the Water Board.

CCP Question: Are the listed agencies defacto regulators or was the intention to ensure compliance with Clean Water Act as part of the project description?

Stakeholder Response: DFG management will say they can not be asked to worry about regulating MeHg; the agency is responsible for California ESA and CEQA review.

Water Board Staff Comment: It would be better for the MeHg issue to be looked at in the beginning of project planning rather than at the end when the project comes to the Water Board for permits.

CCP Question: Since DFG is responsible for implementing the CalFED Record of Decision via the CALFED Ecosystem Restoration Program, including decision about project implementation, wouldn’t that make them responsible for MeHg produced and transported from CALFED funded habitat restoration projects .

Stakeholder Comment: All of the Stakeholders in the room have competing problems, mandates and a lack of resources.

Stakeholder Response: Can not write something into the BPA requiring DFG to be responsible for ensuring compliance; not hearing anything that says the Water Board has the right to do this.

The meeting adjourned at 4:00 pm.

August 13 Delta MeHg TMDL Stakeholder Group Meeting Attendees

Bruce Houdesheldt	Northern California Water Association
Carolyn Yale	U.S. Environmental Protection Agency
Christal Love	Center For Collaborative Policy
Charmaine Bernard	Contra Costa County
Cory Koger	U.S. Army Corp of Engineers
Dave Ceppos	Center For Collaborative Policy
Dean Ruiz	SDWA / CDWA
Debbie Webster	CVCWA
Erich Delmas	City of Tracy
Greg Yarris	Cal Waterfowl Association
Hong Lin	City of Sacramento
Jacquelyn Pimental	Department of Water Resources
Janis Cooke	Central Valley Regional Water Quality Control Board
Jeff Willett	City of Stockton
Judi Quan	Delta Protection Commission
Kari Fisher	CA Farm Bureau Federation
Kim Schwab	Regional Water Quality Control Board Stormwater
Laurence Kerckhoff	Department of Water Resources
Lysa Voight	Sacramento Regional County Sanitation District
Mark List	DWR Division of Flood Management
Michelle Wood	Central Valley Regional Water Quality Control Board
Nancy Moricz	Central Valley Flood Protection Board
Noel Lerner	DWR Division of Flood Management
Pablo Garza	The Nature Conservancy
Patrick Morris	Central Valley Regional Water Quality Control Board
Rudy Rosen	Ducks Unlimited
Stephen McCord	Larry Walker Associates
Steve Mindt	California State Lands Commission
Thomas Maurer	U.S. Fish and Wildlife Service
Tim Stevens	CA Dept of Fish and Game
Tony Pirondini	City of Vacaville
Victor Chan	Solano County