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California Regional Water Quality Control Board

Central Coast Region

Arnold Schwarzenegger

Governor

Internet Address: http://www.waterboards.ca.gov/centralcoast 895 Aerovista Place, Suite 101, San Luis Obispo, California 93401-7906 Phone (805) 549-3147 • FAX (805) 543-0397

December 21, 2004

Steve Hammack
City of Santa Cruz
Department of Parks and Recreation
323 Church Street
Santa Cruz, CA 95060-3811

NOTICE OF VIOLATION - DE LAVEAGA GOLF COURSE, SANTA CRUZ, SANTA CRUZ COUNTY; WDID# 3 44C330064

Mr. Hammack:

On December 8, 2004, Regional Water Quality Control Board (Regional Board) staff met with Mr. Miles Hicks (of the City of Santa Cruz) and inspected De LaVeaga Golf Course in Santa Cruz. Mr. Lee Bilberry (of Golf Course Builders, Inc.) was present for part of the inspection. The site was in violation of the statewide National Pollutant Discharge Elimination System General Permit for Discharges of Storm Water Runoff Associated with Construction Activities (Permit).

It was raining during the inspection, and Regional Board staff observed and photographed multiple discharges of sediment-laden water throughout the site, overwhelmed sediment controls, improperly installed sediment controls, and widespread erosion. There were no erosion controls implemented on site. The Permit requires an effective combination of erosion control and sediment control measures. Regional Board staff has serious concerns regarding onsite erosion and sediment discharges due to site conditions during inspection, observed sediment discharges, lack of erosion controls, and the site's proximity to Arana Gulch and Branceforte Creek.

Additionally, Regional Board staff observed an oily sheen in storm water runoff near the construction trailer and found two partly-filled 5-gallon gasoline tanks exposed in the rain and without secondary containment.

During the inspection, staff also noted Storm Water Pollution Prevention Plan (SWPPP) deficiencies, including no signed certification, no documented amendments, and no training information. Regional Board staff did not do a thorough review of the site's SWPPP to determine if there were additional deficiencies. Site inspection records were not available for staff to review; Mr. Hicks indicated he kept an inspection log at his office.

California Environmental Protection Agency



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You are required to submit the following information by **January 27, 2004**:

- 1. <u>Corrective Action and Cleanup Efforts</u> A written report itemizing and describing corrective actions and cleanup efforts implemented since Regional Board staff's inspection. If possible, include site photographs or other evidence to substantiate your claims.
- 2. <u>Inspection Records</u> Copies of storm water inspection records from construction commencement, through December 17, 2004. The submittal shall be organized chronologically by inspection date, pages shall be numbered, and a table of contents shall be included identifying dates and page numbers corresponding to each record.
- 3. Monitoring and Reporting Program A copy of the site's monitoring and reporting program is required. The monitoring and reporting program should be in compliance with Permit requirements.
- 4. Storm Water Pollution Prevention Plan A copy of the updated SWPPP and amendments, including a site map is required. The SWPPP should be amended to incorporate any new or additional best management practices that have been and will be implemented, the implementation schedule, and any additional monitoring. The site map should show the entire project area, identify areas of construction, and label the various areas of construction (such as by greens complex and tee numbers). Construction staging areas and construction stockpile areas should also be identified.

The above numbered items are required pursuant to Permit Section C, Standard Provision 7, "Duty to Provide Information," and are required to determine compliance.

California Water Code Section 13385 specifies the Regional Board can impose civil liability for Permit violations, in the amount of up to ten thousand dollars (\$10,000) for each day the violation occurs. The site should be in full compliance with the Permit to avoid additional liability.

If you have questions regarding this matter, please call Kimberly Gonzalez at (805) 549-3150.

Sincerely,

Roger W. Briggs Executive Officer

Encl: December 8, 2004 Photos

Chis alan

cc: Miles Hicks, De La Veaga Golf Course, 401 Upper Park Road, Santa Cruz, CA 95060 Scott Monn, Golf Course Builders International, 1109 North Palmetto Circle, Eustis, FL 32726

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File: Storm Water - 3 44C330064

Task: Enforcement





PARKS & RECREATION DEPARTMENT

323 Church Street, Santa Cruz, California 95060
831-420-5270 • Fax 831-420-5271 • www.santacruzparksandrec.com

January 24, 2005

Roger W. Briggs, Executive Officer California Regional Water Quality Control Board Central Coast Region 895 Aerovista Place, Suite 101 San Luis Obispo CA 93401-7906



DELAVEAGA GOLF COURSE, SANTA CRUZ: WDID#3 44C3300064

Dear Mr. Briggs:

I received your letter of December 21, 2004 regarding the DeLaveaga Golf Course Project. The City of Santa Cruz will, of course, comply with your request for more information about the erosion and sediment control program at the golf course project. I am compelled to state, however, that I have been disappointed in the content and tone of the communication between our two agencies relating to this project.

The City of Santa Cruz has made every conceivable effort to be responsible stewards of the land at DeLaveaga Golf Course and has devoted considerable time and significant funds to ensure that the project is conducted in accordance with all permit conditions. And yet, the letter of December 21, 2004, signed by Chris Adair, mischaracterizes and exaggerates the problems with the sediment and erosion control observed on December 8, 2004 at the golf course.

Regional Board staff observed overwhelmed silt fences at Tee Complex 5 and other areas on that occasion. Five inches of rain fell that day following a series of previous rain storms. These sediment control methods are not guaranteed to hold under extreme weather conditions. The City has a maintenance crew at the golf course dedicated to the constant repair of silt fences and other erosion control measures. This crew was working during the inspection and accomplished the repair of the silt fencing. This was not noted in your letter.

At Tee Complex 5 there were secondary silt fences that were not overwhelmed by rain water. Sedimentation did not extend down into the canyon or into the storm water system. The secondary silt fencing held the runoff from the breach in the first fence. The inspector did not inspect the condition of the secondary silt fencing to determine if the sedimentation had extended into the canyon. Had she done so, she would have verified that very little sediment extended into the canyon and that the majority of sediment was contained on the project site.

All the breaches of the silt fencing were repaired. Of 18 tee complexes, this was the only one experiencing any breach of the sediment control methods. Overall, the project has in place very effective BMP's, which have been well maintained throughout the construction period.

Roger W. Briggs January 24, 2005 Page 2 of 2

In your letter of December 21, 2004, the Regional Board staff acknowledged that it did not conduct a thorough review of the site on December 8, 2004. Had such a thorough review been conducted, it would have discovered that sediment was contained on the entire project site and was not allowed to drain into the surface water system. Further, if a more complete review had been accomplished, Regional Board Staff would have taken the time to review the inspection records available in the Golf Course Superintendent's office.

The City of Santa Cruz acknowledges that, under these very difficult weather conditions, having more erosion control measures in place would have been beneficial. No constructive suggestions regarding new or useful erosion control measures have been offered by the Regional Board staff, but I attach a detailed itemization of corrective actions the City has undertaken to implement the most effective BMP's for the project.

The City of Santa Cruz has always intended to work cooperatively with the Regional Water Quality Control Board and its staff to ensure the continued protection of our water quality. It is not necessary to resort to accusatory and punitive language before first taking advantage of our willingness to be a partner in attaining the goals of both of our agencies. I hope the spirit of our communication can be positive and constructive in the future.

Sincerely,

Steve Hammack

Superintendent of Parks

Attachments: Letter from California Regional Water Quality Control Board dated 12-21-04

Amended Map of DeLaveaga Golf Course Improvements Project Amended Storm Water Pollution Prevention Plan, pages 5, 7, 8 and 17

Amended Notice of Intent

Corrective Action and Cleanup Efforts

DeLaveaga Golf Course Renovation Project Inspection Log

DeLaveaga Golf Course Renovation Project Monitoring and Reporting Log

Description of Submitted Photographs, 01-10-05

cc: Chris Adair

Kimberly Gonzalez

Regional Water Quality Control Board Members (7)

Richard Wilson, City Manager, City of Santa Cruz

Dannettee Shoemaker, Director of Parks and Recreation, City of Santa Cruz



Alan C. Lloyd, Ph.D.

Agency Secretary

California Regional Water Quality Control Board

Central Coast Region

Arnold Schwarzenegger

Internet Address: http://www.waterboards.ca.gov/centralcoast 895 Aerovista Place, Suite 101, San Luis Obispo, California 93401-7906 Phone (805) 549-3147 • FAX (805) 543-0397

March 14, 2005

CERTIFIED MAIL 70041350000221990641

Steve Hammack City of Santa Cruz Department of Parks and Recreation 323 Church Street Santa Cruz, CA 95060-3811

NOTICE OF VIOLATION - DELAVEAGA GOLF COURSE, SANTA CRUZ, SANTA CRUZ COUNTY; WDID#344C330064

Mr. Hammack:

On January 12, 2005, Regional Water Quality Control Board (Regional Board) staff met with Mr. Miles Hicks (of the City of Santa Cruz) and inspected De LaVeaga Golf Course in Santa Cruz. The site was in violation of the statewide National Pollutant Discharge Elimination System General Permit for Discharges of Storm Water Runoff Associated with Construction Activities (Permit).

It was not raining during the inspection, but according to Mr. Hicks, there had been approximately one inch of rain over the previous two days. Regional Board staff asked Mr. Hicks to take her to all construction areas, and he did so. However, since Mr. Hicks had another appointment/commitment that afternoon, staff walked parts of the site again, unescorted.

While it appears some efforts were made to repair silt fencing, install fiber rolls, and protect storm drain inlets, the site was still in violation of Permit requirements. Regional Board staff observed and photographed (see Attachment 1):

- Improperly stored chemicals
- . Unprotected storm drain inlets
- . Inlet protection and silt fencing in need of maintenance
- . Improperly installed fiber roll and silt fencing
- . Dewatering discharge without appropriate sediment controls and monitoring
- . Unfiltered pond water discharge

During the inspection, Regional Board staff informed Mr. Hicks of the various problems. He said they would be addressed, and spoke to onsite personnel right away.

Staff did not request or review the site's Storm Water Pollution Prevention Plan and amendments, Monitoring and Reporting Program, and inspection logs during the inspection because Regional Board staff expected to receive copies of those documents by January 27, 2005 (as requested in the December 21, 2004 Notice of Violation).



Regional Board staff received your January 24, 2005 letter, and has the following comments (text from your letter is italicized):

1. "I received your letter of December 21, 2004 regarding the DeLaveaga Golf Course Project. The City of Santa Cruz, will, of course, comply with your request for more information about the erosion and sediment control program at the golf course project."

We received your letter and attachments. However, you failed to submit the following information requested in the December 21, 2004 Notice of Violation:

- <u>SWPPP and Amendments</u> It appears the site's Storm Water Pollution Prevention Plan was not submitted in its entirety. (Only pages 5, 7, 8 and 17, and a map were received.) Additionally, SWPPP amendments (if any) are not dated and directly attached to the SWPPP, as the Permit requires. While signed certification is now included in the SWPPP, there are still significant deficiencies; perhaps because a complete SWPPP was not submitted. (SWPPP requirements are included in Permit 'Section A'.)
- Monitoring and Reporting Program A "Monitoring and Reporting Log," and an "Inspection Log" were submitted; however, a copy of the site's monitoring and reporting program was not submitted. (Monitoring and Reporting Program requirements are included in Permit 'Section B'.)

Failure to submit all the information requested in the December 21, 2004 Notice of Violation is a Permit violation; the information is due immediately.

2. "I am compelled to state, however, that I have been disappointed in the content and tone of the communication between our two agencies relating to this project."

The Notice of Violation is a form of informal enforcement, commonly used to inform Permitted entities of their violations and potential penalties, and to request additional information.

3. "The City of Santa Cruz has made every conceivable effort to be responsible stewards of the land at DeLaveaga Golf Course and has devoted considerable time and significant funds to ensure that the project is conducted in accordance with all permit conditions. And yet, the letter of December 21, 2004, signed by Chris Adair, mischaracterizes and exaggerates the problems with the sediment and erosion control observed on December 8, 2004 at the golf course."

The letter of December 21, 2004 includes factual documentation of Regional Board staff's December 8, 2004 inspection, further documented by site photographs.

4. "Regional Board staff observed overwhelmed silt fences at Tee Complex 5 and other areas on that occasion. Five inches of rain fell that day following a series of previous rain storms. These sediment control methods are not guaranteed to hold under extreme weather



conditions. The City has a maintenance crew at the golf course dedicated to the constant repair of silt fences and other erosion control measures. This crew was working during the inspection and accomplished the repair of the silt fencing. This was not noted in your letter."

In planning, implementing, and maintaining an erosion and sediment control system, it is important to understand the difference between erosion control and sediment control. Erosion control practices protect the soil surface and prevent soil particles from being detached by rainfall or wind. Erosion control treats soil as a resource with value, and works to keep it in place. Sediment control practices trap soil particles after they have been dislodged and moved by wind or water. Sediment controls are generally passive systems that rely on filtering or settling soil particles out of the water or wind that is transporting them. Sediment controls treat soil as a waste product and work to remove it.

While this may have been an unusually extended and/or heavy rain event, failure of sediment controls and resulting discharges are partly attributable to the complete lack of erosion controls on site (despite Permit and project mitigation requirements for such controls). Observed sediment control failures were also partly attributable to the sediment controls' improper installation, need of maintenance, and improper placement/design.

Indeed, Regional Board staff did observe overwhelmed silt fences at Greens Complex 5 and other areas during her three-hour inspection. However, during the inspection Regional Board staff did not see any maintenance person or maintenance crew repairing silt fences or other control measures. Regional Board staff also saw no evidence (such as footprints, tire tracks, repair materials, repair equipment, etc.) to indicate a maintenance crew was repairing or installing silt fence during the inspection. Mr. Bilberry (with Golf Course Builders Int'l, the contractor specified in your recent submittal as "responsible for implementing SWPPP for the project") left the site during the inspection. Additionally, Mr. Hicks did not offer any information about a maintenance crew working during the inspection on December 8, 2004. However, he assured staff that the problems she pointed out during the inspection would be addressed.

5. "At Tee Complex 5 there were secondary silt fences that were not overwhelmed by rain water. Sedimentation did not extend down into the canyon or into the storm water system. The secondary silt fencing held the runoff from the breach in the first fence. The inspector did not inspect the condition of the secondary silt fencing to determine if the sedimentation had extended into the canyon. Had she done so, she would have verified that very little sediment extended into the canyon and that the majority of sediment was contained on the project site."

Regional Board staff agrees that some sections of silt fence were not overwhelmed by rain water. However, Regional Board staff has photographs documenting discharge of muddy water off the construction area into the adjacent canyons at several locations from overwhelmed silt fences and undercut silt fences. Greens Complex 5 did have two silt fences in one area; however, they were not effective in removing sediment from the discharge and there was still a discharge of muddy water from this area to the adjacent canyon.



6. "All the breaches of the silt fencing were repaired. Of 18 tee complexes, this was the only one experiencing any breach of the sediment control methods. Overall, the project has in place very effective BMP's, which have been well maintained throughout the construction period."

Regional Board staff's inspection report and December 8, 2004 site photographs contradict your claim that there was only one breach of control methods on site during the inspection. Furthermore, during a subsequent site inspection on January 12, 2005, staff identified various problems with onsite practices, including improperly stored chemicals, unprotected storm drain inlets, best management practices in need of maintenance, improperly installed best management practices, dewatering without appropriate sediment controls and monitoring, and discharge of unfiltered pond water. (See photographs in Attachment 1.)

7. "In your letter of December 21, 2004, the Regional Board staff acknowledged that it did not conduct a thorough review of the site on December 8, 2004."

In the December 21, 2004 Notice of Violation, Regional Board staff acknowledged that she "...did not do a thorough review of the site's SWPPP to determine if there were additional deficiencies." (SWPPP stands for Storm Water Pollution Prevention Plan.) At the end of the site inspection, staff asked to see the SWPPP and briefly reviewed the document, noting several deficiencies.

Nowhere did the letter state the site was not thoroughly inspected. During the inspection, Regional Board staff asked Mr. Hicks to take her to every construction area on site. He told her that he would do so, and at the end of the inspection said he had done so. Additionally, after your telephone conversation with Chris Adair, during which you claimed staff did not thoroughly inspect the site, staff again confirmed with Mr. Hicks that he had indeed taken her to every construction area at the golf course during the December 8, 2004 inspection.

8. "Had such a thorough review been conducted, it would have discovered that sediment was contained on the entire project site and was not allowed to drain into the surface water system."

During the December 8, 2004 inspection, staff thoroughly inspected every construction area on site. In more than one location, muddy water was discharging offsite into canyons and surface drainageways.

9. "...Further, if a more complete review had been accomplished, Regional Board Staff would have taken the time to review the inspection records available in the Golf Course Superintendent's office."

The Permit requires Permittees to keep inspection reports and to provide them to Regional Board staff upon request. The letter mentioned the inspection reports simply to identify which documents were or were not reviewed on site during the inspection.



10. "The City of Santa Cruz acknowledges that, under these very difficult weather conditions, having more erosion control measures in place would have been beneficial. No constructive suggestions regarding new or useful erosion control measures have been offered by the Regional Board staff, but I attach a detailed itemization of corrective actions the City has undertaken to implement the most effective BMP's For the project."

During Regional Board staff's December 8, 2004 inspection, there were no erosion control measures implemented in the construction areas. Staff agrees that having erosion control measures would have been beneficial in preventing erosion, and would have likely reduced the sediment load on the silt fences. Failure to have an effective combination of erosion and sediment controls implemented on site is a violation of the Permit. During staff's subsequent inspection on January 12, 2005, the site was still in violation of this requirement.

Regional Board staff's job during a site inspection is to determine if the site is in compliance with Permit requirements. Regional Board staff pointed out onsite deficiencies, and discussed common erosion and sediment control measures used at construction sites. However, it is not staff's job to design erosion and sediment controls for the site. The project owner is responsible for implementing an effective combination of erosion and sediment controls.

The Permit states: "Individuals responsible for SWPPP preparation, implementation, and Permit compliance shall be appropriately trained, and the SWPPP shall document all training." The SWPPP reviewed during the December 8, 2004 inspection had no training documentation, and Mr. Hicks said he had never attended any storm water training or erosion and sediment control training. The items you submitted on January 24, 2005 also failed to include training documentation for responsible personnel. Failure to train responsible personnel responsible for SWPPP implementation and revision, and failure to document training are both violations of the Permit.

11. "The City of Santa Cruz has always intended to work cooperatively with the Regional Water Quality Control Board and its staff to ensure the continued protection of our water quality. It is not necessary to resort to accusatory and punitive language before first taking advantage of our willingness to be a partner in attaining the goals of both of our agencies. I hope the spirit of our communication can be positive and constructive in the future."

Regional Board staff has given the City every opportunity to comply with Permit requirements. Unfortunately, the City is still not in compliance with the Permit, as evidenced during the January 12, 2005 inspection and failure to submit the information required in the December 21, 2004 Notice of Violation.

Regional Board staff is recommending formal enforcement for Permit violations. To avoid additional potential liability, Regional Board staff strongly recommends you take steps to ensure the site is in full compliance with the Permit, and that all the information requested in the December 21, 2004 Notice of Violation is submitted immediately.



If you have questions regarding this matter, please call Kimberly Gonzalez at (805) 549-3150 or Chris Adair at (805) 549-3761.

Sincerely,

Roger W. Briggs Executive Officer

Encl: Attachment 1 – January 12, 2005 Photographs

cc: Miles Hicks, De LaVeaga Golf Course, 401 Upper Park Road, Santa Cruz, CA 95060

Scott Monn, Golf Course Builders International, 1109 North Palmetto Circle, Eustis, CL 32726

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File: Storm Water - 3 44C330064

Task: Enforcement



PARKS & RECREATION DEPARTMENT

March 30, 2005

Roger Briggs California Regional Water Quality Control Board Central Coast Region 895 Aerovista Place, Suite 101 San Luis Obispo, Ca, 93401-7906

Mr. Briggs,

This letter is in response to your March 14, 2005 letter regarding the Delaveaga Golf Course Project. I was away from work with a serious illness for 2 weeks and did not receive your letter until March 28 2005. We are currently putting compiling the information you have requested, and will submit it to your office no later than Friday, April 8, 2005.

Please do not hesitate to call Susan Harris at 831 420-5362 if you need something further regarding this project. Thank you for your cooperation in this matter.

Sincerely,

Steve Hammack

Superintendent of Parks



PARKS & RECREATION DEPARTMENT 323 CHURCH STREET, SANTA CRUZ, CA 95060

April 4, 2005

Roger W. Briggs, Executive Officer California Regional Water Quality Control Board Central Coast Region 895 Aerovista Place, Suite 101 San Luis Obispo, CA 93401

DELAVEAGA GOLF COURSE, SANTA CRUZ; WDID #344C330064

Dear Mr. Briggs,

This correspondence is in response to your letter dated March 14, 2005. I was out of the office from March 14 through March 27 and was unable to read your letter until March 28, 2005. The City has been working diligently to prepare this response and packet since I became aware of your letter.

The City made a sincere effort to fully respond to the Notice of Violation letter dated December 12, 2004 and to remedy the problems identified by Regional Water Quality Control Board staff. It appears, however, that some of the items were misunderstood by City staff. We apologize for this misunderstanding and hope that this letter and attachments fully provide the needed information.

The City understood that a copy of the Storm Water Pollution Prevention Plan and Monitoring Program for the DeLaveaga Golf Course Remodel and Improvements (dated August 8, 2004) had previously been submitted to the Regional Board. Thus, the City submitted only the amendments as an attachment to our January 24, 2005 letter. The City now understands that the Regional Board wished to receive the amended document in its entirety. We have enclosed a copy of the complete amended Storm Water Pollution Prevention Plan and Monitoring Program (Attachment 1) with this letter. This document also includes the Monitoring and Reporting Program (please see Section X1 of the document). If this submittal does not fully provide the information expected by the Regional Board, please let us know promptly and we will forward it immediately. Again, we recognize there was a misunderstanding about which documents the Regional Board had previously received and the information needed per your December 12, 2004 letter.

In regard to the site problems identified by Regional Board staff during the inspections and shown in the photographs, a list of correction actions and clean up efforts is enclosed. We have included the corrective actions taken based on the January 12, 2005 inspection as well as copies of the previously submitted corrective actions for the December 8, 2004 inspection (Attachments 2 and 3). In addition we have attached an updated Monitoring

and Reporting Log (Attachment 4) and a complete set of all inspection records (Attachment 5). It is our hope that this information and the corrective actions taken will demonstrate to the Regional Board that the City of Santa Cruz understands its responsibilities under the permit.

Also, in your letter dated March 14, 2005, questions were raised about the level of training received by Miles Hicks, the Golf Course Superintendent. Mr. Hicks received training regarding storm water management, erosion and sediment control from Mr. Steve Halsey, the consultant contracted by the City to prepare the *Storm Water Pollution Prevention Plan and Monitoring Program*. Mr. Hicks has prepared a summary of this training, which is included at Attachment 6 to this letter.

The DeLaveaga Golf Course Remodel and Improvements project is approximately 80 per cent complete as of April 4, 2005. The completed improvements, erosion and sediment control measures as of April 1, 2005 are shown on the enclosed Site Plan (Attachment 7). All three of the greens complexes are now covered with either sod or straw mulch. The straw mulched areas have already been seeded and are germinating with new grass. All of the tee tops have been sodded and the contractor is in the process of straw mulching and seeding the areas surrounding the tees. The use of erosion and sediment control measures, such as fiber rolls, straw mulch, silt fences, and sand bags, are also depicted on the attached Site Plan. In addition all of the storm drain inlets shown on the Site Plan have been protected with filter fabric and sand bags.

In closing, the City recognizes and apologizes for misunderstanding the information requested by the Regional Board. Our staff and the contractor have worked diligently to prevent storm water pollution and provide the needed documents. We recognize there have been some site problems, but we have dedicated substantial time and funding to remedy these concerns.

If the information provided with this submittal does not fully meet the Regional Board's requests, please contact me at (831) 420-5366 as soon as possible. It is the City's intent to fully comply with your requests.

Sincerely,

Steve Hammack Superintendent of Parks

Attachments:

- 1) Storm Water Pollution Prevention Plan and Monitoring Program for the DeLaveaga Golf Course Remodel and Improvements (dated August 8, 2004)
- Correction Action and Cleanup Efforts In Response to Inspection of January 12, 2005 (includes photographs taken April 4, 2005)

DeLaveaga Golf Course Page 3

- 3) Correction Action and Cleanup Efforts In Response to Inspection of December 8, 2004 (includes photographs taken January 10, 2005)
- 4) Monitoring and Reporting Log (October 8, 2004 through March 29, 2005)
- 5) Inspection Log (October 8, 2004 through March 29, 2005)
- 6) Summary of training for Miles Hicks, Golf Course Superintendent
- 7) Site Improvements Map updated as of April 1, 2005

Cc: Richard Wilson, City Manager (without attachments)
Dannettee Shoemaker, Director of Parks and Recreation (without attachments)
Miles Hicks, DeLaveaga Golf Course Superintendent