CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION
895 Aerovista Place, Suite 101
San Luis Obispo, California 93401

MONITORING AND REPORTING PROGRAM NO. R3-2019-0042

Waste Discharger Identification No. 3 420114004

for
MISSION HILLS COMMUNITY SERVICES DISTRICT
WASTEWATER TREATMENT PLANT
SANTA BARBARA COUNTY

May 17, 2019

1. **WATER SUPPLY -** Representative samples of the Mission Hills Community Service District (MHCSD, or Discharger) raw water supply (sampled before treatment) must be collected and analyzed as follows:

Table 1 - Water Supply Monitoring

Parameter	Units	Type of Sample	Sampling Frequency
Flow Volume	Gallons per day	Metered	Daily
Constituent			
Chloride	mg/L	Grab	Quarterly (Jan., Apr., July, Oct.)
Nitrate (as N)	mg/L	Grab	Quarterly (Jan., Apr., July, Oct.)
Sodium	mg/L	Grab	Quarterly (Jan., Apr., July, Oct.)
Total Dissolved Solids	mg/L	Grab	Quarterly (Jan., Apr., July, Oct.)
Boron	mg/L	Grab	Semi-Annually (April, Oct)
Sulfate	mg/L	Grab	Semi-Annually (April, Oct)
Carbonate	mg/L	Grab	Semi-Annually (April, Oct)
Bicarbonate	mg/L	Grab	Semi-Annually (April, Oct)
Calcium	mg/L	Grab	Semi-Annually (April, Oct)
Potassium	Mg/L	Grab	Semi-Annually (April, Oct)
Magnesium	mg/L	Grab	Semi-Annually (April, Oct)

mg/L – milligrams per liter

2. **POND FREEBOARD -** MHCSD must document freeboard in all treatment (La Purisima Canyon site, ponds 1 and 2) and percolation ponds (La Purisima Canyon site [ponds 3, 4, 5, 6, and 7] and Rucker site[A] [ponds 8, 9, and 10]).

Table 2 - Pond Freeboard Monitoring

Parameter	Units	Type of Sample	Sampling Frequency
Pond Freeboard	Feet	Measured	Weekly

A - When Rucker Ponds are in use.

3. **INFLUENT -** Representative samples of the MHCSD influent into the wastewater treatment plant must be collected and analyzed as follows:

Table 3 - Influent Monitoring

Parameter	Units	Type of Sample	Sampling Frequency
Flow Volume	Gallons per day	Metered	Daily
Maximum Daily Flow	Gallons per day	Metered	Monthly
Mean Daily Flow	Gallons per day	Calculated	Monthly
Constituent			
Ammonia (as N)	mg/L	8-hour composite	Quarterly (Jan., Apr., July, Oct.)
Biochemical Oxygen Demand, 5-Day	mg/L	8-hour composite	Quarterly (Jan., Apr., July, Oct.)
Chloride	mg/L	8-hour composite	Quarterly (Jan., Apr., July, Oct.)
Sodium	mg/L	8-hour composite	Quarterly (Jan., Apr., July, Oct.)
Total Dissolved Solids	mg/L	8-hour composite	Quarterly (Jan., Apr., July, Oct.)
Total Kjeldahl Nitrogen (as N)	mg/L	8-hour composite	Quarterly (Jan., Apr., July, Oct.)
Total Nitrogen	mg/L	Calculated	Quarterly (Jan., Apr., July, Oct.)
Total Suspended Solids	mg/L	8-hour composite	Quarterly (Jan., Apr., July, Oct.)
Boron	mg/L	Grab	Semi-Annually (April, Oct)
Sulfate	mg/L	Grab	Semi-Annually (April, Oct)
Carbonate	mg/L	Grab	Semi-Annually (April, Oct)
Bicarbonate	mg/L	Grab	Semi-Annually (April, Oct)
Calcium	mg/L	Grab	Semi-Annually (April, Oct)
Potassium	mg/L	Grab	Semi-Annually (April, Oct)
Magnesium	mg/L	Grab	Semi-Annually (April, Oct)

4. **EFFLUENT** - Representative composite samples (i.e., combined grab water quality samples from La Purisima Ponds 3 through 7 and combined grab water quality samples from Rucker Ponds 8 through 10) of wastewater discharged to the percolation ponds must be collected and analyzed for the following constituents:

Table 4 - Effluent Monitoring

Parameter	Units	Type of Sample	Sampling Frequency
Flow Volume [A]	Gallons per day	Estimated [B]	Daily
Maximum Daily Flow	Gallons per day	Estimated [B]	Monthly
Mean Daily Flow	Gallons per day	Estimated [B]	Monthly
Constituent			
Settleable Solids	ml/L	Combined Grab[C]	Weekly
Ammonia (as N)	mg/L	Combined Grab[C]	Quarterly (Jan., Apr., July, Oct.)
Biochemical Oxygen Demand, 5-Day	mg/L	Combined Grab[C]	Quarterly (Jan., Apr., July, Oct.)
Chloride	mg/L	Combined Grab[C]	Quarterly (Jan., Apr., July, Oct.)
Nitrate (as N)	mg/L	Combined Grab[C]	Quarterly (Jan., Apr., July, Oct.)
Nitrite (as N)	mg/L	Combined Grab[C]	Quarterly (Jan., Apr., July, Oct.)
Sodium	mg/L	Combined Grab[C]	Quarterly (Jan., Apr., July, Oct.)
Total Dissolved Solids	mg/L	Combined Grab[C]	Quarterly (Jan., Apr., July, Oct.)
Total Kjeldahl Nitrogen (as N)	mg/L	Combined Grab[C]	Quarterly (Jan., Apr., July, Oct.)
Total Nitrogen	mg/L	Calculated	Quarterly (Jan., Apr., July, Oct.)
Total Suspended Solids	mg/L	Combined Grab[C]	Quarterly (Jan., Apr., July, Oct.)
Boron	mg/L	Grab	Semi-Annually (April, Oct)
Sulfate	mg/L	Grab	Semi-Annually (April, Oct)
Carbonate	mg/L	Grab	Semi-Annually (April, Oct)
Bicarbonate	mg/L	Grab	Semi-Annually (April, Oct)
Calcium	mg/L	Grab	Semi-Annually (April, Oct)
Potassium	mg/L	Grab	Semi-Annually (April, Oct)
Magnesium	mg/L	Grab	Semi-Annually (April, Oct)

A – Document quantity of flow to each set of percolation/evaporation ponds (La Purisima ponds and Rucker ponds when in use).

B – Based on influent flow. Water currently flows subsurface from Pond 2 to Pond 3.

C – Combined grab water quality samples from La Purisima Ponds 3 through 7.

5. **GROUNDWATER MONITORING -** Representative samples of groundwater from well MW#1 must be collected and analyzed for the constituents listed below. The Discharger must measure depth to groundwater (to 0.1 feet accuracy) in the monitoring well before it is purged and sampled. Before sampling, purge three well volumes from each well or until measurements of temperature, pH, specific conductance, turbidity, and dissolved oxygen have stabilized. The Discharger must collect groundwater samples from the well after the groundwater level in the well has recovered sufficiently to ensure the collection of representative groundwater samples.

Table 5 - Groundwater Monitoring

Parameter	Units	Type of Sample	Sampling Frequency
Depth to groundwater	Feet	measure	Quarterly (Jan., Apr., July, Oct.)
Constituent			
Ammonia (as N)	mg/L	Grab	Quarterly (Jan., Apr., July, Oct.)
Nitrite (as N)	mg/L	Grab	Quarterly (Jan., Apr., July, Oct.)
Nitrate (as N)	mg/L	Grab	Quarterly (Jan., Apr., July, Oct.)
Total Kjeldahl Nitrogen (as N)	mg/L	Grab	Quarterly (Jan., Apr., July, Oct.)
Total Nitrogen	mg/L	Calculated	Quarterly (Jan., Apr., July, Oct.)
Total Dissolved Solids	mg/L	Grab	Quarterly (Jan., Apr., July, Oct.)
Sodium	mg/L	Grab	Quarterly (Jan., Apr., July, Oct.)
Chloride	mg/L	Grab	Quarterly (Jan., Apr., July, Oct.)
Boron	mg/L	Grab	Semi-Annually (April, Oct)
Sulfate	mg/L	Grab	Semi-Annually (April, Oct)
Carbonate	mg/L	Grab	Semi-Annually (April, Oct)
Bicarbonate	mg/L	Grab	Semi-Annually (April, Oct)
Calcium	mg/L	Grab	Semi-Annually (April, Oct)
Potassium	mg/L	Grab	Semi-Annually (April, Oct)
Magnesium	mg/L	Grab	Semi-Annually (April, Oct)

Additional wells may be added to the groundwater monitoring program as deemed appropriate by the Executive Officer.

6. **BIOSOLIDS MONITORING -** Biosolids/Sludge monitoring must be consistent with a Central Coast Water Board Executive Officer approved sampling/disposal plan and at a minimum must analyze for the following constituents:

Table 6 - Biosolids Monitoring

Parameter [A]	Units	Type of Sample	Minimum Frequency [B] of Analysis
Quantity/Volume	Tons and Cubic Yards	Measured during removal	Each load
Constituent			
Moisture Content	Percent	Grab	Consistent with approved sampling plan
pH	pH Units	Grab	
Ammonia (N)	mg/kg	Grab	
Nitrite (N)	mg/kg	Grab	
Nitrate (N)	mg/kg	Grab	
Total Kjeldahl Nitrogen	mg/kg	Grab	

Total Nitrogen	mg/kg	Grab	Consistent with approved sampling plan
Total Phosphorus	mg/kg	Grab	
Grease and Oil	mg/kg	Grab	
Arsenic	mg/kg	Grab	
Boron	mg/kg	Grab	
Cadmium	mg/kg	Grab	
Copper	mg/kg	Grab	
Chromium	mg/kg	Grab	
Lead	mg/kg	Grab	
Mercury	mg/kg	Grab	
Molybdenum	mg/kg	Grab	
Nickel	mg/kg	Grab	
Selenium	mg/kg	Grab	
Zinc	mg/kg	Grab	

A - Characterization required by disposal facility that complies with the conditions of title 40 Code of Federal Regulations section 503 may be submitted in place of this list.

B - If no need for sludge/biosolids removal occurs during a given year, the Discharger will have no obligation for biosolids monitoring. In this case, reporting must explain the absence of this monitoring.

7. MONITORING LOCATION DESCRIPTIONS

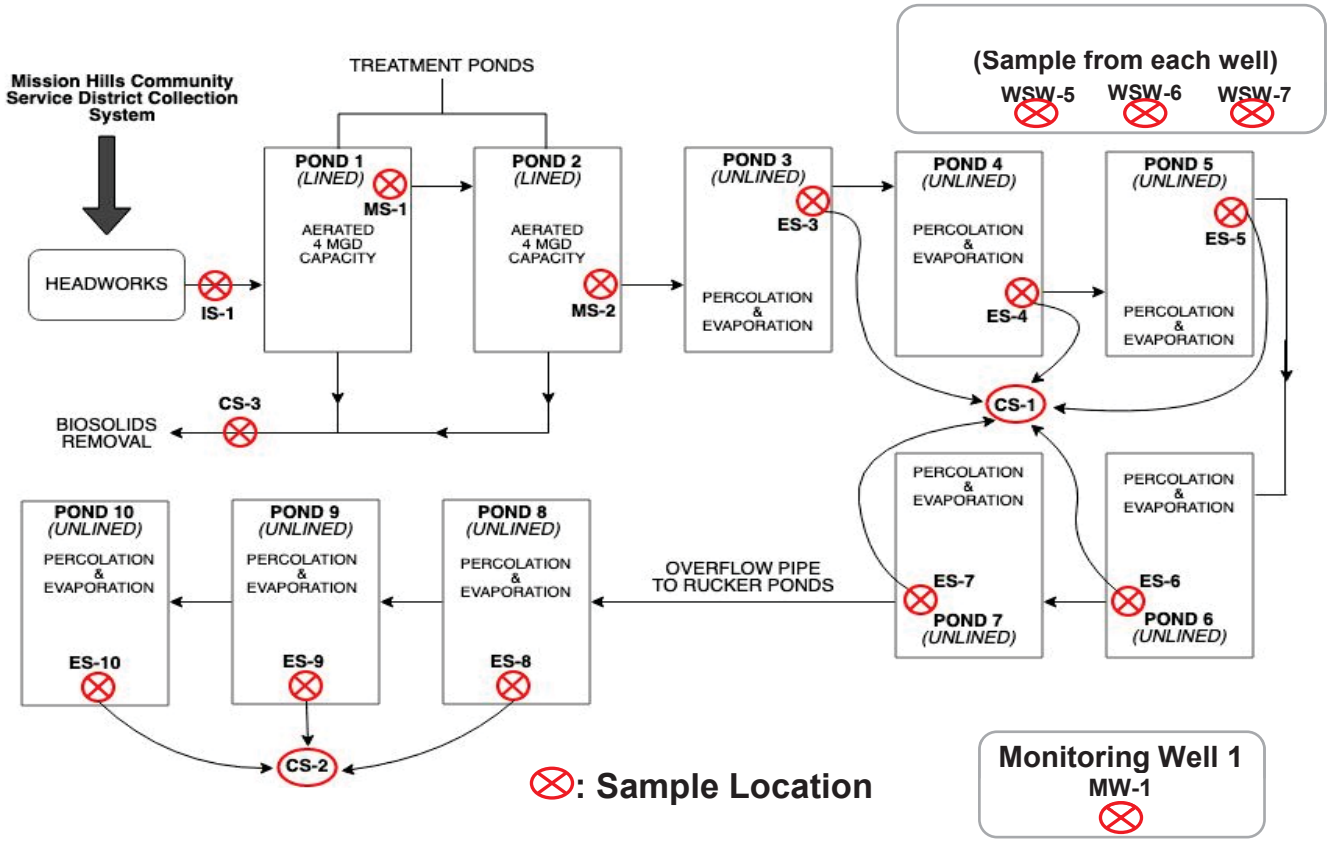

Figure 1 - Mission Hills Community Service District Wastewater Treatment Plant process flow schematic with marked sampling locations and sample point titles. *Schematic not to scale. See Table 7 for a description of the sample codes.

Figure 2 – Aerial photograph of Mission Hills Community Service District Wastewater Treatment Plant. Location of water supply wells labeled in top left corner with blue crosses. Location of monitoring well labeled in bottom right corner with red cross.

Table 7 – Summary of sampling locations shown in Figures 1 and 2 with corresponding GeoTracker field point codes, sample descriptions, and sampling frequencies.

Sample Title	GeoTracker Field Point Code	Sample Description	Sampling Frequency
Influent Sample – 1	IS-1	Influent sample representative of peak loading conditions	Quarterly (Jan., Apr., July, Oct.)
Midpoint Sample – 1	MS-1	Midpoint sample taken from second half of treatment pond 1	Quarterly (Jan., Apr., July, Oct.)
Midpoint Sample – 2	MS-2	Midpoint sample taken from second half of treatment pond 2	Quarterly (Jan., Apr., July, Oct.)
Effluent Sample – 3	ES-3	Effluent sample from pond 3	Quarterly (Jan., Apr., July, Oct.)
Effluent Sample – 4	ES-4	Effluent sample from pond 4	Quarterly (Jan., Apr., July, Oct.)
Effluent Sample – 5	ES-5	Effluent sample from pond 5	Quarterly (Jan., Apr., July, Oct.)
Effluent Sample – 6	ES-6	Effluent sample from pond 6	Quarterly (Jan., Apr., July, Oct.)
Effluent Sample – 7	ES-7	Effluent sample from pond 7	Quarterly (Jan., Apr., July, Oct.)
Composite Sample – 1	CS-1	Composite sample representative of effluent from ponds 3 – 7.	Quarterly (Jan., Apr., July, Oct.)
Effluent Sample – 8[A]	ES-8	Effluent sample from pond 8	Quarterly (Jan., Apr., July, Oct.)
Effluent Sample – 9[A]	ES-9	Effluent sample from pond 9	Quarterly (Jan., Apr., July, Oct.)
Effluent Sample – 10[A]	ES-10	Effluent sample from pond 10	Quarterly (Jan., Apr., July, Oct.)
Composite Sample – 2[A]	CS-2	Composite sample representative of effluent from ponds 8 – 10.	Quarterly (Jan., Apr., July, Oct.)
Composite Sample – 3[B]	CS-3	Composite sample representative of biosolids removed from ponds 1 and 2.	Each load of Biosolids
Water Supply Well – 5[C]	WSW-5	Water Supply well sample from State well # 4210019-004	Quarterly (Jan., Apr., July, Oct.)
Water Supply Well – 6[C]	WSW-6	Water Supply well sample from State Well # 4210019-006	Quarterly (Jan., Apr., July, Oct.)
Water Supply Well – 7[C]	WSW-7	Water Supply well sample from State Well # 4210019-007	Quarterly (Jan., Apr., July, Oct.)
Monitoring Well – 1	MW-1	Monitoring well sample from monitoring well #1 (Lat, Long: 34.682226338, -120.424972999)	Quarterly (Jan., Apr., July, Oct.)

A – Effluent and composite samples only required when Rucker ponds (ponds 8-10) are in use.
B – Composite sample 3 only required when biosolids are removed from ponds 1 and 2.
C – Water supply well samples required for wells active during monitoring period.

8. REPORTING

I. SELF-MONITORING REPORTS (SMRS)

A. **Rucker Ponds Operation and Maintenance Program -** Within **36 months** from the date of adoption of Order No. R3-2019-0042 and prior to discharging to Rucker Ponds, MHCSD must submit a proposed operation and maintenance program for the Rucker Ponds for review and approval by the Executive Officer.

Information to discuss in the report includes, at a minimum:

- Condition and functionality of the ponds.
- Proposed near-term and long-term maintenance strategies and actions.
- Potential localized water quality impacts to both the Santa Ynez River (both surface and sub-surface flow) and the Lompoc Plain Groundwater Sub-basin.
- Flood management strategies.

B. **Quarterly Reports -** Submit quarterly reports to the Central Coast Water Board on **the 20th day of the month following the end of the quarter** (e.g., data collected in January, February, and March is due April 20th). The reports must bear the certification and signature of the Discharger's authorized representative. At a minimum, the quarterly reports must include:

1. Results of all required monitoring obtained during the previous three months (e.g., monitoring reports due July 30th must include sampling events occurring from April through June).
2. All data collected or calculated over the previous reporting period and a narrative summary of the data.
3. The results of any pollutant or parameter monitored more frequently than is required by this monitoring program (i.e., quarterly groundwater elevation, etc.).
4. A comparison of monitoring data to the discharge specifications, applicable effluent limits, disclosure of any violations of Order No. R3-2019-0042, and an explanation of any violation of those requirements. Data must be presented in tabular format.
5. Monitoring data must be arranged in tabular format so that the date, constituents, and concentrations are readily discernible. The data must be summarized in such a manner to clearly illustrate whether the discharge complies with effluent limitations.
6. Dates, types (e.g., potable water, wastewater, etc.), and volumes of discharge to Rucker ponds.
7. A summary of noncompliance, reasons for noncompliance, and corrective action.
8. A summary of disposal area monitoring observations and any other significant events relating to compliance with Order No. R3-2019-0042, reasons for noncompliance, and corrective action.
9. Copies of laboratory analytical report(s), quality assurance/quality control sheets, and chain of custody form(s).
10. The certification and signature of the Discharger's authorized representative.

C. **Annual Report -** Submit annual reports to the Central Coast Water Board by **January 30th following the monitoring year**, in compliance with Standard Provisions 2013[1], (and any updates to the Standard Provisions) Section C. General Reporting Requirements, Item 16. In addition, you must include the following:

[1] \\ca.epa.local\RB\RB3\Shared\WDR\Standard Provisions\WDR Standard Provisions Dec 2013.pdf

1. System Performance – Evaluate and discuss the wastewater treatment system performance including:
   - System design parameters (e.g., flow rates, retention time, expected load reductions, expected concentrations, etc.)
   - Operational measures (e.g., increased/decreased aeration, changes in retention time, etc.)
   - Changes in system water quality (e.g., dissolved oxygen, temperature, etc.)
   - Increase/decrease of load in influent and effluent water quality (e.g., BOD, TSS, TDS, Cl, Na, Total Nitrogen, etc.)

II. SPILL REPORTS

A. Reporting to the Central Coast Water Board

1. In accordance with Central Coast Water Board Sewage Spill Reporting Policy[2], sewage spills greater than 1,000 gallons and/or all sewage spills that enter a water body of the State, or occur where public contact is likely, regardless of the size, must be reported to the Central Coast Water Board by telephone as soon as notification is possible and can be provided without substantially impeding cleanup or other emergency measures, and no later than 24 hours from the time of that the Discharger has knowledge of the overflow.

2. Unless fully contained, overflows to storm drains tributary to Waters of the United States must be reported as discharges to surface waters.

3. A written report of all relevant information must be submitted to the Central Coast Water Board within five days of the spill and must include no less information than is required on the current spill reporting form or equivalent, as approved by the Central Coast Water Board Executive Officer. Attachments to the report should be used as appropriate, and incidents requiring more time than the five-day period must be followed by periodic written status reports until issue closure. Photographs taken during the overflow incident and cleanup must be submitted to the Central Coast Water Board in hard copy and electronic format. Copy of such reports must also be provided to the Santa Barbara County Health Department.

4. The Discharger must sample all spills to surface waters to determine their effects on surface waters and submit the data to the Executive Officer within 30 days. Samples must, at minimum, be analyzed for total and fecal coliform bacteria and enterococcus bacteria for spills to marine water, and fecal coliform bacteria for spills to fresh water. Sampling must be conducted in the affected receiving water body upstream, at, and downstream of the overflow's point of entry, and as necessary to characterize the overflow's impact and to ensure adequate clean-up.

5. Spills under 1,000 gallons that do not enter a water body must be reported to the

[2] State Water Resources Control Board, Water Quality Enforcement Policy, February 19, 2002, California Environmental Protection Agency

Central Coast Water Board in writing and electronically (Excel spreadsheet preferred) within 30 days. Such reports must include, at a minimum, a tabular summary of spill dates, locations, volumes, whether the spill discharged to surface waters (including conveyances thereto) or land, whether cleanup and/or disinfection was performed, the spill's cause, the number of spills at the location in the last three years, and weather conditions.

Contact Information
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-5411
Email: centralcoast@waterboards.ca.gov
Phone: (805) 549-3147
FAX: (805) 549-0397

6. As part of the annual report, the Discharger must submit to the Central Coast Water Board annual summary reports of all overflows between January 1 and December 31 of the previous year. The report is **due January 30th of each year** and it must **summarize** the following information for each overflow:
    a. Information requested in the current Sewage Spill Report Form;
    b. How the overflow volume was estimated and/or calculated;
    c. Photograph(s) of the spill, if taken;
    d. Where the spill entered any storm drain inlet or surface waters;
    e. Steps taken or planned to reduce, eliminate, and prevent recurrence of the overflow, and a schedule of major milestones for those steps;
    f. Steps taken or planned to mitigate the impact(s) of the overflow, and a schedule of major milestones for those steps; and
    g. Any additional correspondence and follow up reports, as necessary, to supplement the Sewage Spill Report Form and to provide detailed information on cause, response, adverse effects, corrective actions, preventative measures, or other information.

7. The annual summary report must include detailed evaluations of repetitive or chronically occurring circumstances, such as problematic collection system areas or common overflow causes, and the corrective actions taken to address such systematic problems.

8. A statement certifying that there were no wastewater overflows for the last twelve months may be submitted (when appropriate) in lieu of the annual summary report.

B. Reported to the Governor's Office of Emergency Services:

1. In accordance with the Governor's Office of Emergency Services (OES) 2018 Fact Sheet regarding the reporting of sewage releases (as revised or updated), the California Water Code, commencing with section 13271, requires that a discharge of sewage into or onto state waters must be reported to OES.

https://www.caloes.ca.gov/FireRescueSite/Documents/Sewage%20Fact%20Sheet.pdf

To report sewage releases of 1,000 gallons or more (currently the federal reportable quantity) to OES, **verbally notify the OES Warning Center at: (800) 852-7550, or (916) 845-8911.**

The following fax number should be used *for follow-up information only:* (916) 262-1677. The reportable quantity is subject to revision by the State of California. OES reporting requirements for sewage releases and hazardous materials can be located on the OES Website @ www.oes.ca.gov in the California Hazardous Material Spill/Release Notification Guidance. The OES Hazardous Materials Unit staff is available for questions at (916) 845-8741.

2. OES Reporting Exceptions: Notification to OES of an unauthorized discharge of sewage or hazardous substances is not required if: 1) the discharge to state waters is a result of a cleanup or emergency response by a public agency; 2) the discharge occurs on land only and does not affect state waters; or 3) the discharge is in compliance with applicable waste discharge requirements. These exceptions apply only to the Discharger's responsibility to report to OES, and do not alter the Central Coast Water Board's reporting policies or waste discharge requirements.

III. OTHER REPORTS – The Discharger must report the results of any special studies, monitoring, and reporting required by the Order. The Discharger must submit such reports consistent with dates found in this Monitoring and Reporting Program.

IV. ELECTRONIC SUBMITTAL

A. The Discharger must submit all requested information electronically in a searchable PDF format and email to centralcoast@waterboards.ca.gov using the transmittal sheet found at the link below as the cover page.

https://www.waterboards.ca.gov/centralcoast/water_issues/programs/wastewater_permitting/docs/transmittal_sheet.pdf

The transmittal sheet must be signed.

B. Additionally, electronically submit all reports/documents and laboratory data (using the transmittal sheet as the cover page) to the State Water Resources Control Board's GeoTracker[3] database for the MHCSD in Santa Barbara County site GeoTracker No. WDR100033210 over the internet at:

http://www.waterboards.ca.gov/ust/electronic_submittal/index.shtml.

C. Table 8 below summarizes all the electronic reporting requirements. Staff may request

[3] Information for first-time GeoTracker users is available here:

https://www.waterboards.ca.gov/ust/electronic_submittal/docs/beginnerguide2.pdf

submittal of some documents on paper, particularly drawings or maps that require a large size to be readable, or in other electronic formats where evaluation of data is required.

Table 8 - GeoTracker Electronic Submittal Information (ESI) Data Requirements

Electronic Submittal	Description of Action	Action	Frequency
Reports and documents	Complete copy of all documents including monitoring reports (in searchable PDF format) and any other associated documents related to the facility.	Upload directly to GeoTracker all monitoring reports (in searchable PDF format) and any other associated documents.	On or before the due dates required by this Order and for other documents when requested by Central Coast Water Board staff.
Laboratory Data	All analytical data (including geochemical data) in electronic deliverable format (EDF). This includes all water, soil, and vapor samples collected when monitoring a discharge.	Direct your State Certified Laboratory staff to upload all laboratory data directly to GeoTracker.	On or before the due date of the required monitoring report.
Depth to groundwater	Monitoring wells must have the depth-to-water information reported. Report data only for wells defined as permanent sampling points.	Upload depth-to-water information to the GeoTracker GEO_WELL file.	On or before the due date of the required monitoring report.
Boring Logs and Well Screen intervals	Boring logs must be prepared by a registered professional and submitted in PDF format separately (not only as attachments to reports)	Upload boring logs (in searchable PDF format) to GeoTracker GEO_BORE file whenever a new boring is drilled.	Every time a new boring is drilled.
Location Data (Geo XY)	Survey and mark all permanent sampling locations (i.e., monitoring wells, drinking water wells, and permanent influent/effluent sampling locations). These data points are required prior to laboratory data uploads.	Upload the survey data to the GeoTracker Geo_XY file.	Every time a permanent monitoring point is established.
Elevation Data (Geo Z)	Survey and mark the elevation at the top of groundwater well casings for all permanent groundwater wells. These points are required prior to depth-to-water data uploads.	Upload the survey data to the GeoTracker GEO_Z file.	One-time, for all groundwater monitoring wells.
Geo Map	Site layout, map of facilities, wastewater treatment system, and disposal area(s).	Upload the Site layout PDF to the GeoTracker site plan file.	Year one and every five years thereafter and when the facilities are modified.

The Discharger must implement the above monitoring program as of the date of this Monitoring and Reporting Program.

Ordered by: Matthew T. Keeling Digitally signed by Matthew T. Keeling Date: 2019.05.29 09:35:18 -07'00'
for John M Robertson, Executive Officer

Date: _____

HEK
WDR Program = A32000
ECM Subject Name = Mission Hills CSD MRP No. R3-2019-0042
ECM/CIWQS Place ID = 240951
GeoTracker No. = WDR100033210
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