

STATEWIDE STORMWATER COALITION

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City of Calistoga
City of Carmel by the Sea
City of Ceres
City of Colfax
City of Davis
City of Del Rey Oaks
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Town of Loomis
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County of Placer
County of Santa Cruz
County of Shasta
County of Sonoma
County of Stanislaus
County of Yolo
California State
Association of Counties
League of California Cities
Regional Council of Rural
Counties
Shasta County Water
Agency

August 4, 2014

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-2000



**RE: COMMENT LETTER – PROPOSED AMENDMENTS TO
STATEWIDE WATER QUALITY CONTROL PLANS TO CONTROL
TRASH AND THE DRAFT STAFF REPORT, INCLUDING THE DRAFT
SUBSTITUTE ENVIRONMENTAL DOCUMENTATION**

Dear Ms. Townsend and Members of the Board:

Thank you for the opportunity to comment to the State Water Resources Control Board's ("Board") proposed amendments to Statewide Water Quality Control Plans to Control Trash and the draft staff report including the draft substitute environmental documentation. This letter presents the Statewide Stormwater Coalition (SSC) concerns with the draft. The SSC is a coalition of Phase II permittees who share and collaborate on storm water issues affecting their jurisdictions. The Coalition represents the concerns of more than forty (40) cities through-out the state. The SSC also supports the comments submitted by the California Stormwater Quality Association.

Overall the Coalition supports the State's efforts to reduce trash and recognizes the importance of developing efficient, cost-effective measures that will result in trash reduction. While the SSC supports the goal of incorporating feasible measures to reduce trash impacts, this goal must be balanced with practical realities. For example, the draft Amendment requires full capture of trash, which we contend is an unreasonable and unattainable goal that will ultimately make permittees vulnerable to increased legal challenges. Litter and trash has not been identified as a pollutant of concern much less the subject of a total maximum daily load (TMDL) in many of communities in the coalition that struggle with the concept and associated costs of implementing full capture systems.

The draft Amendment is also economically impracticable as written. Many municipalities are just beginning to recover from the recent economic downturn and have neither the staff nor resources necessary to comply with these increased requirements. The reality of limited funding must be addressed within the draft Amendment for permittees who are fiscally unable to comply.

The SSC respectfully requests the State Board's consideration and response to issues brought forth by this letter. These issues are outlined below and grouped into the following categories:

SSC COMMENT LETTER

August 4, 2014

- General Comments
- Specific Comments
- Issues with Track 2 and,
- Definition of Trash

GENERAL COMMENTS

General Comments:

- 1) The use of an asterisk throughout the document appears to be a reference to a definition contained within the Glossary but, this intension is not stated in the Amendment or its supporting documents. In addition, there are no corresponding asterisks in the Glossary.
- 2) As was discussed at the July 16th workshop, there is no clear path to demonstrate compliance with Track 2 nor does it appear that it is possible to achieve full compliance via Track 2 based on research perform under the Municipal Regional Permit. If Track 1 is the only viable option for compliance, it becomes an unfunded mandate.
- 3) The presence of other significant trash deposition mechanisms suggest that a more global and cost-effective solution to trash accumulation is the path of ‘true source control’ as demonstrated by the Brake Pad Partnership and other similar methods such as extended manufacturer product responsibility, and redemption values. Please note that there are numerical sequencing and referencing discrepancies throughout Appendix E that are not specifically addressed below (e.g. ‘Draft text of... Chapter III’ v. ‘Draft text of ... Chapter IV’)
- 4) The State should consider replacing ambiguous terms like ‘substantial’ with ‘Comparative Trash Generation Rate’ when defining alternative priority land uses.

SPECIFIC COMMENTS:

- 1) **Reference:** Draft text of the Trash Amendments proposed to be amended Chapter III – Water Quality Objectives of the ISEEBE Plan B. Trash*:
Trash* shall not accumulate in ocean waters, along shorelines or adjacent areas in amounts that adversely affect beneficial uses or cause nuisance.’

Comment: Define ‘adjacent areas’.

Suggested Language:

Trash shall not accumulate in ocean waters, along shorelines or within those areas of the normal high water mark of inland waters in amounts that adversely affect beneficial uses or cause nuisance*

- 2) **Reference:** Draft text of the Trash Amendments proposed to be amended Chapter IV – Water Quality Objectives of the ISWEBE Plan B. Trash* 1 Applicability a.:
These Trash Provisions shall be implemented through a prohibition of discharge (Chapter IV. B.2.) and through NPDES permits issued pursuant to section 402(p) of the Federal Clean Water Act (as set forth in Chapter IV.B.3 below).

SSC COMMENT LETTER

August 4, 2014

Comment: Include entities that have NPDES permits or WDRs but may not operate a defined MS4 system or be regulated as an industrial discharger such as special districts overseeing the collection of trash.

Suggested Language:

When an MS4 is required to fulfill the requirements of the ISWEBE Plan Chapter IV the entities holding solid waste franchising authority separate from the MS4 are required to comply with the provisions of this Chapter and participate in the strategies selected by the MS4, either by actively designing and installing the selected full capture devices in a drainage system discharging to Waters of the US, or by paying to the MS4 their share of the cost of design, installation, maintenance and reporting as required by Chapter IV. Those entities shall also have responsibility for responding to enforcement issues or violations originating from their discharges.

- 3) **Reference:** Draft text of the Trash Amendments proposed to be amended Chapter IV – Water Quality Objectives of the ISEEBE Plan B. Trash*:2d

Comment: Under the Prohibition of discharge for Pre-Production Plastics (PPP), please clarify if this section assigns discrete responsibilities for this prohibition to the manufacturers and/or users of PPP's or do these requirements fall under the responsibility of the local jurisdiction (MS4)?

- 4) **Reference:** Draft text of the Trash Amendments proposed to Chapter IV – Implementation of Water Quality Objectives of the ISWEBE Plan B. Trash*_3.a.

MS4* permittees with regulatory authority over priority land uses shall be required to comply...

- (1) Track 1: Install, operate and maintain full capture systems* for all storm drains that captures runoff from one or more of the priority land uses* in their jurisdictions: or...

Comment: The fact an entity has 'regulatory authority' over a land use does not entitle that entity to install, operate or maintain a device on that private property.

Language suggestion:

- (1) Track 1: Install, operate and maintain full capture systems *within the MS4 system* ~~for all storm drains that captures runoff from one or more of the priority land uses in their jurisdictions:~~

- 5) **Reference:** Draft text of the Trash Amendments proposed to Chapter IV – Implementation of Water Quality Objectives of the ISWEBE Plan B. Trash*_3 a. (2).

Comment: Track 2 compliance is not obtainable. Its efficacy and its comparability to Track 1 may be left up to the subjective future interpretation of equivalence by the courts. As such, Track 2 is not a viable option as written. Rather,

SSC COMMENT LETTER

August 4, 2014

objective criteria for the measurement of “performance results” of Track 2 should be explicitly delineated by the Amendment.

- 6) **Reference:** Draft text of the Trash Amendments proposed to Chapter IV – Implementation of Water Quality Objectives of the ISWEBE Plan B. Trash* 3.d.

A permitting authority* may determine that specific land uses or locations (e.g. parks, stadia, schools, campuses, or roads leading to landfills) generate substantial amounts of Trash*. In the event that the permitting authority* makes that determination, the permitting authority* may require the MS4* to comply with Chapter IV.C.3.a or Chapter IV.C.3.b (as the case may be) *(please note: this reference in the Draft Trash Amendment appears to be incorrect; it should be Chapter IV. B 3 a (1) and Chapter IV. B 3 a (2))* with respect to such land uses or locations.

Comment: A permittee may select Track 1 and identified a land use or location that may lie within the municipality’s boundaries, however those discharges may not drain through the MS4’s system to the receiving water (e.g. a nonpoint source park or facility that private drains directly into surface water). **Therefore the permittee cannot be responsible for those discharges.**

Comment: In addition, the term “**substantial**” is vague and open to subjective interpretation. Trash generation rate for these newly-identified sources should be comparable to land uses listed by the Amendment.

Language suggestion:

*A permitting authority may determine that specific land uses or locations (e.g. parks, stadia, schools, campuses, or roads leading to landfills) **have a Trash generation rate that is comparable to other priority land uses.** generate substantial amounts of Trash*. In the event that the permitting authority makes that determination, the permitting authority may require the MS4 to comply with Chapter IV.B 3 a (1.) or Chapter IV.B.3.a (2.) (As the case may be) with respect to such land uses or locations **if the land uses or locations drain into the MS4 system such that the permittee is able to cost effectively continue sole-implementation of its chosen Track.***

- 7) **Reference:** Draft text of the Trash Amendments proposed to Chapter IV – Implementation of Water Quality Objectives of the ISWEBE Plan B. Trash 4. Other Dischargers;

A permitting authority* may require dischargers that are not subject to Chapter IV B 3 herein to implement Trash* controls in areas or facilities that may generate Trash”. Such areas or facilities may include (but are not limited to) high usage campgrounds, picnic areas, beach recreation areas, parks not subject to an MS4*permit, or marinas.

Comment: The State and Federal governments own properties that these proposed amendments define as priority land uses. However, with the exception of properties controlled by The California Department of Transportation

SSC COMMENT LETTER

August 4, 2014

(Department) regulated under the provision of this Policy, a permittee has limited authority to require compliance at State or Federal facilities.

Language suggestion:

The permitting authority may determine that specific land uses, locations or activities, (e.g. State or Federally owned properties or railroads), are priority land uses or have a comparative trash generation rate to land uses specified in the Chapter. Such areas or facilities may include (but are not limited to) high uses campgrounds, picnic areas, beach recreation areas, parks not subject to an MS4 permit or marinas. In the event that the permitting authority makes this determination, an MS4 receiving flows from the designated land use may refer that facility to the permitting authority and/ or the U.S. EPA for regulatory oversight. Upon referral, the MS4 will not be held responsible for trash that accumulates in surface waters, along shorelines or adjacent areas from these facilities.

- 8) **Reference:** Draft text of the Trash Amendments proposed to Chapter IV – Implementation of Water Quality Objectives of the ISWEBE Plan B. Trash 5.a.(3):

For MS4* permittees that elect to comply with Chapter IV.B.3.a.1 (Track 1), full compliance shall occur within ten (10) years of the effective date of the first implementing permit (whether such permit is re-opened, re-issued or newly adopted), along with achievements of interim milestones such as average load reductions of ten percent (10%) per year. In no case may the final compliance date be later than fifteen (15) years from the effective date of these Trash Provisions*.

Comment: It is important to recognize that prior to installation of any infrastructure, MS4 permittees must perform a plethora of tasks (including but not limited to mapping of priority land uses and the systems that drains those geographic areas, modeling hydraulics and hydrology (H&H) needed to support the infrastructure changes in a manner that reduces the potential for flooding, obtaining State certification of the selected full capture devices, securing financing, adopting governing ordinances, creating bid documents and contracting). **Therefore, the MS4 may obtain an ‘average of ten percent installed every year.’ over the first five years, but it is unlikely that an MS4 could achieve that goal within the first two years of adoption of the Trash Amendment.**

Comment: The Glossary defines a Full Capture System as a system meeting certain specifications and which, **prior to installation**, has been individually approved by the Executive Director (or designee) after review of all relevant supporting documentation. Inclusion of, ‘prior to installation’ penalizes communities that have been proactive and installed trash capture devices that meet the Full Capture System specifications. In addition, State Board staff has suggested drop inlet type devices as (at least) one method of full capture compliance. The unincorporated area of Sacramento County has nearly 50,000 drop inlets within priority use areas. While not all 50,000 would immediately be submitted for Certification, the State should anticipate

SSC COMMENT LETTER

August 4, 2014

receiving 10's of thousands of submittals (or more) per year from across the State. **The language should be modified to allow post-installation certification. If post-installation is not allowed, there needs to be language crafted that extends the compliance dates and absolves an MS4* from milestone compliance schedules if the State is unable to provide Certification in a timely (60-days) manner.**

Suggested Language:

Prior to installation, full capture systems must be certified by the Executive Director, or designee, of the State Water Board. If the Executive Director, or designee, of the State Water Board does not make a determination regarding the status of certification within 60 days of request by a permittee the full capture system will be deemed as approved by the Board.

- 9) **Reference:** Draft text of the Trash Amendments proposed to Chapter IV – Implementation of Water Quality Objectives of the ISWEBE Plan B. Trash 6:

The permitting authority* may give MS4* permittees that are complying under the section Chapter IV.C. 3 a. up to a three (3) year time extension for achieving full compliance in areas where regulatory source controls* are employed that take effect prior to or within three (3) years of the effective date of these Trash Provisions*. Each regulatory source control* employed by an MS4* will be eligible for up to a one (1) year time extension.

Comment: As recognized during the July 16th (2014) workshop, 'source control' at the local level is limited to the banning of single-use products. This may only result in a transformation of the constituents within trash and not the desired reduction of trash. Statewide source controls that encourage waste/trash reduction (including but not limited to redemption value, legislation regarding extended manufacture product responsibility/product reformulation) could achieve that which neither Track 1 nor Track 2 can which is the removal of trash from our environment. **We encourage the State to partner with a broad stakeholder group to evaluate and implement true-source control prior to implementing the Trash Amendments. We encourage the State to consider developing/adding language that recognizes (via time extensions and/or milestone adjustments) local jurisdictions that can demonstrate more global and/or statewide true-source removal efforts.**

- 10) **Reference:** Draft text of the Trash Amendments proposed to Chapter IV – Implementation of Water Quality Objectives of the ISWEBE Plan B. Trash 7.a.:

The permitting authority* must include monitoring and reporting requirements in its implementing permits. The following monitoring and reporting provisions are the **minimum** requirements that must be included within the implementing permits:

MS4* permittees that elect to comply with Chapter IV.C.3.a.1. (Track 1)
(Please note: this is an incorrect reference in the Draft Trash Amendment.

SSC COMMENT LETTER

August 4, 2014

The correct reference is Chapter IV.B 3.a.1) shall provide a report to the applicable permitting authority demonstrating operation, maintenance, and the Geographic Information System (GIS) mapped location and drainage area served of its full capture systems* on an annual basis.*

Comment: Although the State made clear during stakeholder meetings and the July 16th (2014) workshop there will be no monitoring required for those choosing Track 1, both the draft report associated with the Trash Amendments and the language used within this Section allow for inconsistent statewide application of the State's intent.

Suggested Language:

Add after the existing text as defined above: 'MS4 permittees that elect to comply with Chapter IV.B.3.a.(1) (Track 1), are considered to be in full compliance when the full capture systems are installed in the MS4 system servicing the listed priority land uses and exempt from future monitoring requirements.'

- 11) **Reference:** Draft text of the Trash Amendments proposed to Chapter IV – Implementation of Water Quality Objectives of the ISWEBE Plan B. Trash 7.b.:

MS4* permittees that elect to comply with Chapter IV.C.3.a.2. (Track 2) *(Please note: this is an incorrect reference in the Draft Trash Amendment. The correct reference is Chapter IV.B 3.a.2)* shall develop and implement monitoring plans that demonstrate the mandated performance results, effectiveness of the full capture systems*, other treatment controls*, institutional controls*, and/or multi-benefit projects*, and compliance with the performance standard. Monitoring reports shall be provided to the applicable permitting authority * on an annual basis, and shall include GIS-mapped locations and drainage area served for each of the full capture systems*, other treatment controls*, institutional controls*, and/or multi-benefit projects installed or utilized by the MS4* permittee. At a minimum, the monitoring reports shall address and answer the following questions:

Comment: While the State made-clear during the July 16, 2014 workshop that there will be no monitoring required for those geographic areas within a Track 2 community that are “fully-captured”, both the draft report associated with the Trash Amendments and the language used within this section allow for inconsistent statewide application of the State's intent.

Suggested Language:

*Add after the existing text listed above: 'Those areas that drain through full capture systems *, are considered to be in full compliance and therefore exempt from future monitoring requirements.'*

- 12) **Reference:** Draft text of the Trash Amendments proposed to Chapter IV – Implementation of Water Quality Objectives of the ISWEBE Plan B. Trash 7.b.(4)/(5):

SSC COMMENT LETTER

August 4, 2014

(4) Has the amount of Trash* in the MS4 decreased from the previous year? If so, by how much? If not, explain why.

(5) Has the amount of Trash* in the MS4's receiving water(s) decreased from the previous year? If so, by how much? If not, explain why.

Comment: The permittee can only be responsible for discharges from the MS4*. Therefore, ~~delete 7.b. (5)~~ as it is superfluous in light of 7.b. (4) - which requires the MS4* to report changes in the amount of trash discharged from its system. In addition, Trash assessments in receiving waters will generate highly variable data that precludes yearly comparisons and an evaluation of causal deposition mechanisms will be speculative.

13) **Reference:** Draft text of the Trash Amendments proposed to Appendix A: Glossary of the ISWEBE Plan:

FULL CAPTURE SYSTEM: ...Prior to installation, full capture systems* must be certified by the Executive Director, or designee, of the State Water Board. Uncertified full capture systems* will not satisfy the requirements of these Trash Provisions*. To request certification, a permittee shall submit a certification request letter that includes all relevant supporting documentation to the State Water Board's Executive Director. The Executive Director, or designee, shall issue a written determination approving or denying the certification of the proposed full capture system* or conditions of approval, including a schedule to review and reconsider the certification.

Comment: It is unclear if each full capture system must be certified 'prior to each installation' or if so long as it receives an overall technical certification by the State that it meets the specifications of a FULL CAPTURE SYSTEM. This penalizes communities that have been proactive with regards to trash-capture and provides no discernable benefit. In addition, State Board staff has suggested drop inlet type devices as (at least) one method of full capture compliance. **Delete: 'Prior to installation' from the definition; or, add language that allows pre-certification by the Executive Director or designee of the State Water Board of full capture devices and/or features for a range of flows or allow certification (sign/stamp) by a Civil Engineer licensed in the State of California.**

14) **Reference:** Draft text of the Trash Amendments proposed to Appendix A: Glossary of the ISWEBE Plan PRIORITY LAND USES: (6) Equivalent alternate land uses...

...Equivalent alternative land uses: An MS4* permittee with regulatory authority over priority land uses* may issue a request to the applicable permitting authority* that it be allowed to comply under Chapter IV.B.3.a.1. with alternate land uses within its jurisdiction that generate rates of trash that are equivalent to or greater than one or more of the high density residential, industrial, commercial, missed urban, and/or public transportation station sites, facilities or land uses defined above. Comparative Trash* generation rates shall be established through the reporting of quantification measures

SSC COMMENT LETTER

August 4, 2014

such as street sweeping and catch basin cleanup records; mapping; visual trash presence surveys, such as the “Keep America Beautiful Visible Litter Survey”; or other information as required by the permitting authority.*

Comment: As currently constructed, the reference to ‘it’ and ‘its’ may be misinterpreted as to referring to the applicable permitting authority. Instead the language should be clarified by using the term “**MS4**” in its place. It should be made clear under the language of this section that the MS4 should be allowed to substitute alternative land uses for the listed land uses on a one-for-one basis if they are found to generate higher rates of trash.

Suggested Language:

Equivalent alternative land uses: An MS4* permittee with regulatory authority over priority land uses* may issue a request to the applicable permitting authority* that **the MS4** be allowed to comply under Chapter IV.B.3.a.1. with alternate land uses within its jurisdiction that generate rates of trash that are equivalent to or greater than one or more of the high density residential, industrial, commercial, mixed urban, and/or public transportation station sites, facilities or land uses defined above.

Comment: The second sentence description of tasks necessary to establish a ‘Comparative Trash* Generation Rate’ establishes a framework of comparative activities, removes subjectivity and should not be at the discretion of the permitting authority to approve or reject.

Suggested Language:

*‘Comparative Trash Generation Rate: **Shall be a rate** established through the reporting of quantification measures such as street sweeping and catch basin cleanup records; mapping; visual trash presence surveys, such as the “Keep America Beautiful Visible Litter Survey”; or other information **necessary to establish a defensible comparison (e.g. within one standard deviation of the geometric mean)** as required by the permitting authority.*

- 15) **Reference:** Draft text of the Trash Amendments proposed to Appendix A: Glossary of the ISWEBE Plan TRASH

TRASH* : All improperly discarded solid material from any production, manufacturing, or processing operation including, but not limited to, products, product packaging or containers constructed of plastic, steel, aluminum, glass, paper, or other synthetic or natural materials. .

Comment: The current definition of trash is far reaching. It can be legally construed to include virtually every solid material from common trash to sand.

Suggested Language:

Trash means macroscopic, solid objects, consisting of anthropogenic substances, that are generated by human activity and which have been

SSC COMMENT LETTER

August 4, 2014

released to the environment either as a result of intentional improper disposal, unintentionally as a result of careless handling or storage, or by accident. Prior to its release to the environment, trash would be either a material (if still considered usable), or a solid waste (once a decision has been made to discard it). "Anthropogenic substances" in this context specifically refers to the underlying substance and is intended to capture manufactured substances; it thus excludes fecal waste, green waste, food waste, soil, sand, and sediment, but includes objects made of paper, metal, plastic, glass, concrete rubble, milled wood, and other manufactured materials.

Two categories of trash are recognized:

- 1. Industrial/commercial process trash: This category is any trash generated and released in conjunction with industrial or commercial activity, such as transport, handling, processing, use, manufacture, or disposal of materials or solid waste. This category includes trash generated as a result of improper handling transport, or disposal of solid waste that was initially properly disposed of by another end user.*
- 2. End-user trash: This category is any trash generated and released as the result of improper disposal by the end user or consumer of a product, packaging, or materials.*

Reference: The Substitute Environmental Document page 135 Section 6.8.2 of the staff report

. . . "Full capture systems are placed at the inlet (catch basin inserts) or outlet (trash net) of the storm drain system, or inline (vortex separation system) and do not require any type of re-contouring of the surrounding area nor alteration of any stream courses. . ."

Comment: The retrofitting existing drainage systems with full capture devices that include both drain inlet screening or inline devices may result in adverse effects on the hydraulic capacities of those systems that could result in significant localized flooding and unsafe roadway conditions. The Substitute Environmental Document page 135 Section 6.8.2 of the staff report, does not adequately address this issue. The document indicates that proper maintenance is adequate mitigation for the issue of 'clogged devices' that may cause flooding, mainly due to trash accumulation and leaf litter and therefore this is a less than significant impact. In areas with ice and snow accumulation, ongoing maintenance of drain inlet capture devices will not mitigate clogging devices due to ice and snow. In these higher elevations, clogged devices may exacerbate driver safety issues, cause flooding and additional erosion due to flooding, and restrict access to the storm drain system for maintaining flows in the winter. The only solution for communities subjected to these conditions is to install vortex devices within their mainlines which is more expensive and difficult to access under

SSC COMMENT LETTER

August 4, 2014

snow load conditions. **The requirements of the Trash Amendment should take into consideration winter weather conditions and be seasonally relaxed to accommodate them.**

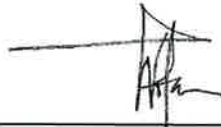
In closing, the SSC requests the State Board carefully revise the language within the draft Amendment to address the issues referred to herein. We believe it is in the best interest of the SSC and the State Board to continue discussions on these items so the final Amendment adopted by the State Board has clear, unambiguous language that will result in a reduction of trash throughout the State.

Please contact Chris Kraft, Engineering Manager, City of Roseville Development & Operations Department at (916) 774-5373 if you have questions or would like to discuss any items further.

Sincerely,



Susan Rohan,
Mayor
City of Roseville



Tricia Wotan,
Environmental Regulations Manager
City of Monterey



Paul Saini
Associate Civil Engineer
County of Stanislaus



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SSC COMMENT LETTER

August 4, 2014



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