

Appendix B

**Comment Letters Received on the Notice of
Preparation and Initial Study**

GALLO VINEYARDS INC.

P. O. BOX 1130
MODESTO, CA 95353

February 24, 2004

Mr. Gary Dias, Sr. Civil Engineer
MID
P. O. Box 4060
Modesto, CA 95352

Mr. Jack Bond, Sr. Civil Engineer
City of Modesto
P. O. Box 642
Modesto, CA 95353

Re: Water Facilities Expansion – West Reservoir

Gentleman:

Gallo Vineyards, Inc. (“GVI”) submits the following comments regarding the initial study of the MRWTP Phase Two Expansion Project, and in particular the proposed West Reservoir site located at APN 030-001-010 (“Vineyard Site”), which is owned by GVI.

Locating the West Reservoir at the Vineyard Site would have significant environmental impacts that could be easily avoided by relocating the West Reservoir to one of the alternative sites.

The Vineyard Site is located on land subject to a Williamson Act contract and containing prime agricultural soils and a highly productive vineyard, which is part of a larger vineyard operation. Removing productive vineyard and converting the site to a reservoir would convert prime agricultural land to urban uses, which would be a significant environmental impact. Also, the reservoir site would adversely affect the farming operations on the remaining 220 acre vineyard operations. These impacts to irreplaceable agricultural resources would have a significant environment impact which could be easily avoided by selecting one of the other alternatives, which are located on smaller non-agriculturally viable parcels.

public comment
file/walt
scan/greg will
E-Team

Tuolumne River Trust

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February 26, 2004

Greg Dias
Modesto Irrigation District
P.O. Box 4060
Modesto, CA 95352

RE: Comments on Water Facilities Expansion

Dear Mr. Dias,

This letter is a follow-up to the remarks I provided you at the Public Meeting on Monday, February 9, 2004.

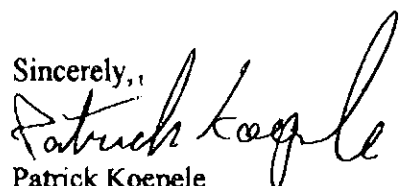
As I informed you at the meeting, impacts to downstream flows need to be carefully evaluated. Table 1 states that "Phase II of the expansion would divert about 33% of the summer flow. For 20% of the summer period, Phase II of the project would divert >50% of the streamflow. Reduced flows would result in increased temperature and TDS, and reduced Dissolved Oxygen. Provided that FERC minimum flows are maintained, there would be NS impact to anadromous fish."

This statement is problematic for two reasons:

- 1) The FERC minimum flows may not remain as they are. The National Marine Fisheries Service recently petitioned FERC to consult regarding the effects of Don Pedro operations on steelhead trout. Though FERC deferred this petition, they are engaged in informal consultation with NOAA Fisheries, the U.S. Fish and Wildlife Service, the California Department of Fish and Game, and several conservation organizations, including the Tuolumne River Trust. If, as a result of informal consultation, changes are considered necessary or desirable, the Commission can either institute a reopener proceeding to require them, or can entertain a voluntary amendment application from the licensee.
- 2) Even if, in the short-term, FERC minimum flows are maintained, there may very well be an impact to anadromous fish, most notably steelhead. We believe that existing summer flows are inadequate to maintain water temperatures that do not harm steelhead. Any reductions in summer flows would be a significant impact. Additionally, TID's municipal supply scheme may further reduce flexibility in maintaining summer flows.

I would also like to comment on the potential loss of riparian habitat resulting from the construction of water delivery pipeline across Dry Creek. Any loss should be mitigated both by onsite restoration and offsite purchase and preservation of comparable riparian habitat.

Thank you for considering my comments. If you have any questions, please do not hesitate to contact me.

Sincerely,

Patrick Koepele
Central Valley Program Director



San Joaquin Valley
Air Pollution Control District

Rec'd 3-9-04 *epd*

March 2, 2004

Reference#: 20040032

Greg Dias
Modesto Irrigation District
P.O. Box 4060
Modesto, CA 95352

SUBJECT: NOTICE OF PREPARATION—WATER FACILITIES EXPANSION— MID
WATER TREATMENT PLANT & CITY WATER DISTRIBUTION SYSTEM.

Dear Mr. Dias:

The San Joaquin Valley Unified Air Pollution Control District (District) has reviewed the proposed project and offers the following comments:

The San Joaquin Valley's air quality has been designated nonattainment by the EPA and by the Air Resources Board (ARB) for ozone and fine particulate matter (PM-10). The Federal Clean Air Act (CAA) and the California Clean Air Act require areas that are designated nonattainment to reduce emissions until standards are met.

The District recommends that the air quality section of the EIR have four main components. **Section one** should provide a description of the regulatory environment and existing air quality conditions impacting the San Joaquin Valley. **Section two** should provide estimates of existing emissions and projected pollutant emissions related to any increases in population, vehicle use, and construction activities along with an analysis of the effects of these increases. **Section three** should identify and discuss all existing District regulation that apply to the project. **Section Four** should identify and discuss all feasible mitigation measures which, after implementation, will reduce the air quality impacts generated by this project. Mitigation measures are emission reduction beyond those required in section three.

David L. Crow
Executive Director/Air Pollution Control Officer

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Section 1: *description of the regulatory environment and existing air quality Conditions of the San Joaquin Valley.*

The District has several sources of information available to assist with the existing air quality and regulatory environment section of the EIR. The District's **Guide for Assessing and Mitigating Air Quality Impacts** (GAMAQI) contains discussions regarding the existing air quality conditions and trends of the San Joaquin Valley Air Basin, including those pollutants of particular concern: ozone, PM-10, and carbon monoxide. In addition, it provides an overview of the regulatory environment governing air quality at the federal, state, and regional levels.

Section 2: *projected pollutant emissions generated during the construction and operational phases of the project.*

The growth-inducing and cumulative impacts analyses should take into consideration the existing and planned development both within the project area and in the surrounding areas. The District recommends using a regional transportation model to generate vehicle activity used to calculate motor vehicle emissions associated with large projects. If a regional transportation model is not available, the District recommends the use of the URBEMIS 2002 modeling program to estimate project emissions. Additional guidance is provided in the GAMAQI.

Additionally, the EIR should quantify emissions that are individually small but cumulatively significant sources of pollution. This includes, but is not limited to, emissions from natural gas combustion for space and water heating and emissions from gas-powered lawn and garden maintenance equipment. URBEMIS 2002 may also be used to quantify these emissions.

There should be a discussion of the toxic risk associated with diesel-fueled engines and vehicles. The California Air Resources Board has issued a report entitled **Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles** (October 2000). Appendix VII of the report provides several risk characterization scenarios, which may serve as a starting point for estimating risks from diesel engine emissions. Leland Villalvazo is the District contact for information regarding Health Risk Assessments from diesel emissions, he may be reached at (559) 230-6000.

Section 3: District Rules and Regulations

Current District Rules and Regulation should be addressed in this section, it would also be appropriate to discuss proposed rules that are being developed. Current Rules and Regulation as well as those being developed are available on the District's web site at www.vallevair.org. Additionally, as individual projects are prepared it is strongly

encouraged that the applicants contact the District for any updates. The following is a list of rules, which may apply to this project (this list may not be all inclusive):

- The construction phase of this project can generate emissions from the movement of soil, use of heavy equipment, bulk materials handling, asphalt paving and other related activities. As a result, this project is subject to District Regulation VIII (Fugitive Dust Prohibitions). The purpose of Regulation VIII is to reduce the amount of fine particulate matter (PM-10) entrained into the ambient air from man-made sources. The attached Compliance Assistance Bulletin highlights many of the requirements contained within Regulation VIII. The Compliance Assistance Bulletin is not meant to be all-inclusive, but it can be a useful compliance aid in the field and office alike. Regulation VIII continues to be updated, applicants can find the most current version on the District's web page at www.vallevair.org.
- One of the issues that will arise in conjunction with the proposed demolition is its compliance with the National Emission Standards for Hazardous Air Pollutants (NESHAPS). Specifically, the primary air pollutant of concern is asbestos. To ascertain whether this project is subject to NESHAPS, the project applicant is advised to review the enclosed *Asbestos - Compliance Assistance Bulletin*, dated December 1994. Brian Dodds is the Northern Region's District contact for the program and is available should you need further assistance.
- District Rule 4103 regulates the burning of agricultural material. Agricultural material may not be burned if the land use is converting from agriculture to nonagricultural purposes. In the event that the project burns agricultural material, it would be in violation of Rule 4103 and be subject to District enforcement action.
- All auxiliary engines greater than fifty-brake horsepower per hour, require permitting from the District. To determine if a project or piece of equipment is subject to permit requirements or for further information, the applicant should contact the District's Small Business Assistance Office at (209) 557-6446. To avoid unnecessary delays, application should be submitted to the District as soon as the scope of the project has been determined.

Section 4: *mitigation measures.*

Mitigation measures must be included in the DEIR that reduce the emissions of reactive organic gases (ROG), nitrogen oxides (NO_x), CO, and PM-10 to the maximum extent feasible. Site design and building construction measures that would reduce air quality impacts should be included. In addition, Transportation Control Measures (TCM) should be stressed to the maximum extent feasible. To reduce the reliance on the single occupancy vehicle and encourage the use of alternative modes of transportation thereby improving the air quality in the San Joaquin Valley, the District encourages the incorporation of pedestrian oriented development (POD) and transit oriented development (TOD) strategies into the General Plan. Specific goals, policies, and programs regarding POD and TOD can be found in the District's guidance document titled **Air Quality Guidelines for General Plans**. This document and other resource materials are available from the District upon request.

As a result of the Valley's nonattainment status, the District strongly recommends that the project applicants and the City of Modesto implement all feasible mitigation measures to reduce the amount of ozone precursors that will result from the buildout of this plan. Please note that some of these measures may already exist as City/County development standards. The following is a list of potential mitigation measures, the list is not meant to be all-inclusive, and the District encourages new and innovative ideas.

- Energy efficient design including automated control system for heating/air conditioning and energy efficiency beyond Title 24 requirements, lighting controls and energy-efficient lighting in buildings, increased insulation beyond Title 24 requirements, and light colored roof materials to reflect heat.
- Planting of deciduous trees on the south and westerly facing sides of buildings.
- Require construction equipment used at the site to be equipped with catalysts/particulate traps to reduce particulate and NO_x emissions. These catalysts/traps require the use of ultra-low sulfur diesel fuel (15 ppm). Currently, California Air Resources Board (ARB) has verified a limited number of these devices for installation in several diesel engine families to reduce particulate emissions. At the time bids are made, have the contractors show that the construction equipment used is equipped with particulate filters and/or catalysts or prove why it is infeasible.
- Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent.
- Install wheel washer for all exiting trucks, or wash off all trucks and equipment leaving the site.

- Install wind breaks at windward sides of construction areas.
- All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at least once every 24 hours when operation are occurring. (The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting t limit the visible dust emissions.)
- Use alternative fuel construction equipment.
- Limit the hours of operation of heavy-duty equipment and/or the amount of equipment in use.
- Replace fossil-fueled equipment with electrically driven equivalents (provided they are not run via a portable generator set).
- Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing of construction activity during the peak-hour of vehicular traffic on adjacent roadways (Days declared as Spare the Air Days by the District).
- All diesel engines should be shut off when not in use to reduce emissions from idling.

Thank you for the opportunity to comment. If you have any questions, please feel free to contact me at (209) 557-6400.

Sincerely,



John Cadrett
Environmental Planner
Northern Region

CC: Stanislaus County
Environmental Review Committee
Raul L. Mendez
1010 Tenth Street #6800
Modesto CA, 95354

**SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT
Compliance Assistance Bulletin- December, 1994
Asbestos Synopsis**

Asbestos Demolition/Renovation-Summary

Prior to any renovation or demolition of a facility

Inspect: Conduct an asbestos inspection of the site before:

- Any renovation which 160 sq. ft. of building materials, or 260 linear feet of pipe insulation will be disturbed, or
- Any demolition of a facility with or without asbestos-containing materials

Notify: Submit an asbestos notification form for any regulated renovation or demolition, 10 working days before the activity.

Fees: Fees must be paid to the District with the notification for all regulated renovations and demolitions.

Demolition Release Form: Prior to any demolition, you must have completed a demolition release form. Upon its approval by the District this signed form may be used as proof (needed by the building official) of compliance with, or exemption from, the NESHAP notification requirements.

Submit this form to the building department with your application for a demolition permit.

Applicability

Facilities subject to the NESHAP (regulated facilities) include all commercial buildings, apartments with more than 4 units, other structures and non-portable equipment. Single family dwellings may be exempt, but only on a case by case basis.

Demolitions subject to the NESHAP (regulated demolitions) are demolitions of facilities described above, whether or not asbestos is present.

Regulated renovation applies to any activity in which 160 sq. ft. of regulated asbestos-containing building materials or 260 linear feet of asbestos-containing pipe insulation is disturbed at a regulated facility.

Asbestos Notification and Inspection Requirements

Definitions

| | |
|-------------|--|
| Facilities: | Facilities subject to the rule include "all structures, installations, buildings and equipment, except for single family dwellings and apartments with four or fewer dwelling units." Single family dwellings and apartments are also subject to the regulation if: <ul style="list-style-type: none"> -There is more than one building at a site being renovated or demolished, or -The building had been used for, or is being removed for a commercial or public use, or is to be used as a training burn exercise. |
| Demolition: | In addition to the total destruction of a structure, demolitions include "the removal of any structural load-bearing member from a facility together with any related handling operations or the intentional burning of a building: (training burns conducted by a fire fighting agency). Also , the separation of a structure from its foundation prior to relocation is a demolition. |
| Renovation: | Altering a facility or one or more facility components in any way, including the stripping or removal of regulated asbestos-containing material (RACM) from a facility component. Renovations include all activities in which asbestos could be disturbed at a regulated facility, including the clean up and removal of debris from buildings which have burned. |

SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT
Compliance Assistance Bulletin- December, 1994
Asbestos Synopsis

| | |
|--|--|
| <p>Definitions Continued</p> <p>Regulated Asbestos-Containing Materials (RACM) Include:</p> <p>Friable Asbestos-Containing Material (ACM):</p> <p>Category I nonfriable ACM:</p> <p>Category II nonfriable ACM:</p> | <p>(1) Friable asbestos-containing material (ACM). (2) Category 1 nonfriable ACM in poor condition and "has become friable" or that has or will be subjected to sanding, grinding, cutting, or abrading. (3) Category II nonfriable ACM that has a high probability of becoming, or as become, crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation.</p> <p>Any material containing more than 1 percent asbestos, as determined by Polarized Light Microscopy (PLM) testing, which, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure.</p> <p>Any asbestos-containing packings, gaskets, resilient floor coverings, and asphalt roofing products containing more than 1 percent asbestos as determined by PLM testing.</p> <p>Any asbestos-containing materials, excluding Category 1 ACM, containing more than 1 percent asbestos as determined by PLM testing, which when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.</p> |
| <p>Inspection: done by, or under the direction of a Cal-OSHA certified consultant prior to:</p> <ul style="list-style-type: none"> ○ Any regulated demolition. ● Any renovation activity in which more than 160 sq. ft. of any building material or 260 linear feet of pipe insulation will be disturbed. An inspection is not required if the material to be disturbed is stipulated to be asbestos-containing and will be removed in accordance with the NESHAP. <p>Inspection Report Must Include</p> <ul style="list-style-type: none"> ● A schematic showing the location of all tested materials. ○ The following data for all asbestos-containing materials: <ol style="list-style-type: none"> 1. The amount and description of each material. 2. Percent asbestos content. 3. Whether or not the material is friable. | |
| <p>Notification: An asbestos notification must be submitted to the District <u>at least 10 working days prior to:</u></p> <ol style="list-style-type: none"> 1. Any regulated demolition. 2. Any renovation in which more than 160 sq. ft. or 260 linear ft. of RACM will be disturbed. <p>A copy of the Asbestos Inspection Report must be included with the Notification.</p> <p>Notification will not be considered complete, nor will the 10 working day notice period begin until all required information and fees have been submitted to the District.</p> | |
| <p>Fees: District Rule 3050 requires that nonrefundable asbestos fees be received along with asbestos job notifications. Fees must be paid for regulated asbestos abatement projects and regulated demolition projects, <u>whether or not asbestos is present.</u></p> | |
| <p>Demolition Release Form: The California Health and Safety Code requires that the city or county building official have proof of compliance with, or exemption from, the asbestos notification requirement before he or she issues a demolition permit.</p> <p>After the District has received a demolition notification and is satisfied that the NESHAP notification requirements have been complied with, the District will issue a Demolition Release Form to the person who submitted the notification.</p> | |
| <p>Recycle and Waste Disposal: The asbestos notification must also identify any building materials which will be recycled after removal from a project. The name of the recycling contractor and location of such activity must be identified.</p> | |



San Joaquin Valley Air Pollution Control District

COMPLIANCE ASSISTANCE BULLETIN

September 2002

(Update from June 2002)

Fugitive Dust Control at Construction Sites

Regulation VIII, Fugitive PM10 Prohibitions, of the District's Rules and Regulations regulates activities that generate fugitive dust. Fugitive dust is emitted to the air from open ground or caused by activities such as excavation, transporting bulk materials, or travel on unpaved surfaces. "PM10" is a term applied to small sized particulate matter - microscopic dust particles - in the air. The San Joaquin Valley currently exceeds the air quality standards for particulate matter. It is for this reason that the District adopted Regulation VIII in 1993. Significant amendments to Regulation VIII were adopted in 2001 and became effective May 15, 2002. The following dust control and administrative requirements are applicable at construction sites:

Visible Dust Emissions (VDE). Visible dust emissions may not exceed 20% opacity during periods when soil is being disturbed by equipment or wind at any time. Dust control may be achieved by means of applying water before and during earth work and on traffic areas, phasing work to limit dust, and setting up wind fences to limit wind blown dust. VDE opacity of 20% means the amount of dust that would obstruct the view of an object by 20%.

Soil stabilization. Soil stabilization is required at any construction site after normal working hours and on weekends and holidays. This requirement also applies to inactive construction areas such as phased projects where disturbed land is left unattended. Applying water to form a visible crust on the soil is an effective method for stabilizing a disturbed surface area. Long-term methods include applying dust suppressants or establishing vegetative cover. Restricting vehicle access from the area will help to maintain a stabilized surface. Information regarding stabilization standards and test methods are in Rule 8011 – *General Requirements*.

Carryout and Trackout. These requirements are found in Rule 8041 – *Carryout and Trackout*. Carryout and trackout are materials adhered to vehicle tires and transport vehicles carried from a construction site and deposited onto a paved public road. Should carryout and trackout occur, it must be cleaned up at least daily, and immediately if it extends more than 50 feet from the exit point onto a paved road. The recommended clean-up methods include manually sweeping, sufficiently wetting the area prior to mechanical sweeping to limit VDE or using a PM10-efficient street sweeper. A blower device, or dry sweeping with any mechanical device other than a PM10-efficient street sweeper is prohibited.

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Haul Roads. Dust control is required on all haul roads and unpaved vehicle and equipment traffic areas at construction sites, per Rule 8021 – *Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities*.

Storage Piles and Bulk Materials. The handling, storage, and transportation requirements for bulk materials are found in Rule 8031 – *Bulk Materials*. These requirements include: applying water as materials are handled, stabilizing or covering stored materials, and installing wind barriers to limit VDE. Limiting vehicle speed, loading haul trucks with a freeboard six inches or greater, covering haul trucks, or applying water to the top of the load are options for reducing VDE from vehicle transportation of bulk materials.

Demolition. Wetting of the exterior of a building to be demolished is required. Demolition debris and the area around the demolition must also be controlled to limit VDE. Cleaning up carryout and trackout must be completed according to Rule 8041. Demolition activities are also subject to the District's asbestos rule, Rule 4002 – *National Emission Standards for Hazardous Air Pollutants*.

Dust Control Plans. For large construction projects, Rule 8021 requires the owner or contractor to submit a Dust Control Plan to the District for approval at least 30 days prior to commencing construction activities. This requirement applies to projects that include 40 or more acres of disturbed surface area or will involve moving more than 2,500 cubic yards per day of material on at least three days during the project.

Record keeping. All sites subject to the regulation that employ dust control measures must keep records for each day any dust controls are used. The District has developed record keeping forms for water application, street sweeping, and for "permanent" controls such as applying long term dust palliatives, vegetation, ground cover materials, paving, or other durable materials. Pursuant to Rule 8011, records must be kept for one year after the end of dust generating activities.

Exemptions. Activities in areas above 3,000 feet elevation are exempt from all Regulation VIII requirements. The following exemptions in Rule 8021 apply to construction activities:

- Blasting activities
- Maintenance and remodeling of existing buildings if the addition is less than 50% of the size of the existing building or 10,000 square feet. These activities, however, are subject to the District's asbestos rule, Rule 4002.
- Additions to single family dwellings
- Mowing, disking or other weed control on sites less than ½ acre.

Nuisance. Whether or not the construction activity is exempt from the Regulation VIII requirements, any activity that creates fugitive dust must not cause a nuisance, per Rule 4102 - Nuisance. Therefore, it is important to monitor the dust generating activities and, if necessary, plan for and implement the appropriate dust control measures to limit the public's exposure to fugitive dust.

This is a basic summary of Regulation VIII as it applies to the construction industry. For more information contact the Compliance Division of the District office nearest to you.



SALIDA FIRE PROTECTION DISTRICT

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January 28, 2004

Mr. Greg Dias
Modesto Irrigation District
PO Box 4060
Modesto, CA 95352

RE: WATER FACILITIES EXPANSION / MRWTP PHASE TWO EXPANSION PROJECT

Mr. Dias,

The Salida Fire Protection District ("District") has reviewed the proposed project and offers the following comments:

- This project's North Reservoir proposals, as described in the Downstream City Facilities (Pgs 4-5), appears to be located within the unincorporated areas of Stanislaus County. As noted under Section XIII; Public Services / Fire Protection (Pgs 67-69), the statement of the project area being served by the Modesto Fire Department may be inaccurate. The District is currently servicing the proposed area for the North Reservoir, as noted on Figure 4.
- All buildings constructed shall meet the District's requirements for on-site water for fire protection and/or fire hydrants and hydrant locations, blue reflective street hydrant markers, sprinkler and alarms systems, key-box rapid entry systems, adherence to all applicable codes and ordinances, etc. Complete details will be made available upon request.
- All traffic signals installed and/or retrofitted due to proposed project shall meet the District's requirements for signal preemption. Complete details will be made available upon request.
- Prior to, and during, combustible construction, the District shall approve provisions for serviceable fire vehicle access and fire protection water supplies.

Thank you for the opportunity to comment. If we can be of further assistance, feel free to contact us at (209) 545-0365.

Sincerely,

A handwritten signature in black ink, appearing to read "Dale Skiles". The signature is fluid and cursive, with a large initial "D" and "S".

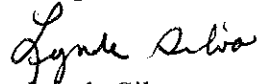
Dale Skiles, Fire Chief
Salida Fire Protection District

Furthermore, the Vineyard Site area is zoned for single family residential uses, and is surrounded by a residential subdivision and frequently used major community facilities: Mark Twain Junior High School; the new St. Stanislaus Catholic Church; the expanded St. Stanislaus School; the expanded Central Catholic High School; and a public park on California Avenue, next to Mark Twain. The huge reservoir (35 feet high and up to 250 feet in diameter), along with associated pumping stations, maintenance areas and fences, would have significant adverse aesthetic impacts on these facilities, the thousands of people who use these facilities daily, and the existing and future homes located in the subdivision bordering the Vineyard Site. These impacts would be minimized by placing the reservoir on one of the alternative sites, which are not located next to schools, parks, a church and a residential subdivision.

While not an environmental impact, please note that similar agricultural property zoned for single family dwellings in Modesto recently sold for over \$200,000 per acre. The acquisition costs for the Vineyard Site would exceed the costs of acquiring the alternative sites. Minimizing acquisition costs would decrease future water rates, which would benefit Modesto rate payers and assist in Modesto's efforts to attract businesses to Modesto.

For the above reasons, we respectfully request that the Environmental Impact Report include an analysis of the above impacts (among others) regarding the Vineyard Site, and identify one of the alternative sites as the recommended reservoir site. Thank you for the opportunity to comment on the initial study. If you have any questions or wish to discuss this further feel free to contact me at 209-341-3511.

Respectfully,



Lynda Silva

Property Administrator

