

WATER AGENCIES' STANDARDS

Design Guidelines for Water and Sewer Facilities

SECTION 4.5 ENVIRONMENTAL REVIEW

4.5.1 PURPOSE

The purpose of this section is to describe the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) together with the environmental documentation, notification and reporting that is required for all Water Agencies.

The following areas will be presented in this section:

STANDARD TERMS AND DEFINITIONS

GENERAL

ENVIRONMENTAL LAW

TYPES OF ENVIRONMENTAL REPORTS

Exemption

Initial Study

Negative Declaration

Mitigated Negative Declaration

Environmental Impact Report

MSCP/NCCP/SubArea Plans

CEQA Spring Updates and other seminars

CEQA (NEPA) Agencies and Permits – (Locations, Phone Numbers,
and Contact Names see Appendix to this Section)

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

PRE-CONSTRUCTION FIELD EDUCATION REQUIREMENTS

REFERENCES AND APPENDIX

4.5.2 STANDARD TERMS AND DEFINITIONS

Wherever technical terms or pronouns occur in these guidelines or in related documents, the intent and meaning shall be interpreted as described in Standard Terms and Definitions.

Many terms and definitions used in this section are derived from the most current editions of the San Diego County Water Authority (CWA) & Member Agencies' Environmental Management and Regulatory Review Course Manual, Local Guidelines for Implementing the Environmental Quality Act, and the 2001 CEQA Deskbook by Bass, Herson & Bogdan, and any supplements.

The following terms and definitions as found in this section shall have the following meaning:

CDFG-	California Department of Fish and Game
CEQA-	California Environmental Quality Act (State)
EIR-	Environmental Impact Report
IS -	Initial Study – also called an Initial Checklist
LEAD AGENCY-	Agency in charge of, or having primary responsibility for preparing and filing environmental documents and approving the project
MSCP-	Multi-Species Conservation Plan
NCCP-	Natural Community Conservation Plan
NEPA-	National Environmental Policy Act (Federal)
"NEG DEC"-	Negative Declaration – an environmental document stating that a particular project will have no significant effect on the environment

MITIGATED NEG DEC-	Mitigated Negative Declaration - an environmental document stating that particular project will have less than significant or no significant effect with the implementation of certain specific mitigation measures
NOD	Notice of Determination – filing document that notices approval of the project and begins 30 statute of limitation for filing a lawsuit
OPR-	Office of Planning and Research
RESPONSIBLE AGENCY-	Public Agency with limited authority for approving carrying out or approving carrying out or approving a project and for complying with CEQA
USACE-	U.S. Army Corps of Engineers
USFWS-	U.S. Fish and Wildlife Services

4.5.3 GENERAL

Most projects that involve any type of construction or maintenance will require environmental processing in the form of documentation, notification and possibly permitting. Each project should be reviewed to determine the applicable environmental document according to each Water Agency's guidelines.

Although most agencies employ environmental consultants for the more detailed projects, a general knowledge of the environmental process is necessary within each agency. It is a good idea to read through the environmental documents from one of your agency's more recent project to get an idea of the information required to complete the environmental phase of a project.

It is the responsibility of the user of these documents to make reference to and/or utilize industry standards not otherwise directly referenced within this document. The Engineer of Work may not deviate from the criteria presented in this section without prior written approval of the District Engineer.

4.5.4 ENVIRONMENTAL LAW

CEQA and NEPA provide the overall framework for the review process. Generally, Public Agencies in California are required to comply only with CEQA. However, NEPA compliance is necessary when the project will use federal funding or when approval by a federal agency is required. This is what is referred to as a "Federal Nexus".

The main differences between the two processes are as follows:

NEPA prescribes a process whereby a federal agency must merely consider the environmental consequences of a project in deciding whether to approve or disapprove the project. A federal agency may approve a project as proposed even if feasible alternatives have been identified.

Conversely, CEQA mandates that an agency may not approve a project as proposed if feasible alternatives are available that would lessen the impact." The primary focus of CEQA is to protect the environment, while NEPA gives "appropriate consideration" to the environment with more emphasis on economic growth. Social, economic, and health effects must be considered under NEPA, while CEQA focuses on effects to the physical environment, with social, economic and health effects considered only if they result from a change to the physical environment.

4.5.5 CEQA OVERVIEW

CEQA was developed to provide an avenue for protection of the physical environment by avoiding or reducing impacts from project construction and development. This is accomplished by providing the public with a document having a detailed description of the project, a thorough analysis of potential environmental impacts and a description of ways to reduce significant impacts. The document, along with the public comments received during

public review, together with staff responses is considered by the Water Agency's Governing Board prior to their decision on whether or not to approve a project.

The most important aspect of dealing with your environmental contact is to remember that proper completion of the environmental documents allows the project to go forward without the fear of legal challenges that could lead to costly delays, work suspension or possible litigation. The Water Agency's environmental staff or consultant must be given a full description of the project construction, operation and maintenance. The CEQA process will protect your project as long as there is proper public notification which includes full disclosure.

With the CEQA process, only those who have filed a response to the CEQA documents during the public review periods and open hearings can legally challenge the project in court after the Notice of Determination has been filed (and 30 day statutory period has elapsed) unless there is an aspect of the project that has environmental impacts that were not disclosed in the environmental document. For instance, a pipeline installation that is going to use an underground pipe bursting method of construction mentions excavation for the needed the launch pits but fails to mention that there will be open trenching for several hundred feet of pipeline to the final connection points. The project could be at risk for not mentioning the open trenching of the project because the impacts of the open trench method may be different from those researched for the launch pits.

4.5.6 TYPES OF ENVIRONMENTAL DOCUMENTS

Environmental documents are prepared and/or submitted by the Lead Agency. To make a valid judgment of the project, the project manager should review the scope of the project completely with the environmental resource agent or consultant to disclose all possible environmental impacts.

"A project is defined as the whole of an action which has the potential for resulting in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment." (Guidelines sec. 15378(a); Pub Res. Code sec 21065). This includes:

- An activity directly taken by a public agency such as public works construction, clearing or grading of land, improvements to existing public structures, zoning ordinances, local general plans.
- An activity supported in whole or in part, through public agency contracts, grants, subsidies, loans, or other assistance from a public agency
- An activity involving the public agency issuance of a lease, permit, license, certificate, or other entitlement for use by a public agency.

If a proposed activity does not come within the definition of a 'project' this refers to the BBK Guidelines, Local Guidelines Section 9.35 it is exempt from CEQA review. Activities that do not fall within the definition of "project" for CEQA review include but are not limited to the following:

- Proposals for legislation
- Administrative or maintenance activities such as purchases for supplies, personnel related actions, general policy and feasibility or planning studies
- Submittal of proposal for vote of the people
- Creation of government funding mechanisms
- Organizational or administrative activities of governments which are political or which do not result in physical changes in the environment
- Activity that will not result in a direct or reasonably foreseeable indirect physical change in the environment

4.5.7 EXEMPTIONS

Once the Lead Agency determines an activity is a “project” subject to CEQA, it must then determine whether an exemption applies. An exemption will basically ‘exempt’ the project from detailed environmental processing.

Exemptions fall into four categories:

- Statutory
- Categorical
- General Rule
- Disapproved Projects

Statutory Exemptions: “a project that is statutorily exempt is entitled to a blanket exemption from all of CEQA’s procedures and policies as delineated by the statutory language.” (CEQA Deskbook)

Several categories of the more commonly used statutory exemptions include the following:

- Ministerial Projects that are exempt from CEQA review include:
 - Issuance of business licenses
 - Approval of subdivision and parcel maps
 - Approval of individual utility service connections and disconnections
 - Issuance of licenses
 - Issuance of a permit to do street work
 - Issuance of building permit where the District does not retain significant discretionary power to modify or shape the project
- Emergency Projects: A situation is considered an ‘emergency’ if it is a sudden, unexpected occurrence involving a clear and imminent danger that demands immediate action to prevent or mitigate loss of or damage to life, health, property or essential public services – an example would be a broken water main.
- Setting of Certain Rates, Tolls, Fares, or Charges
- Planning Studies
- Categorical Exemptions: are classes of projects that have been determined, with certain exceptions, not to have a significant effect on the environment and therefore are exempt from CEQA. There are 32 “Classes” of exempt activities as listed in Section 3.16 of the Local Guidelines. Categorical Exemption requirements can also be found in the CEQA Guidelines Sections 15300 through 15332.
- Installation of new pipeline or maintenance, repair, restoration, removal or demolition of an existing pipeline as set forth in Section 21080.21 of the Public Resources Code, as long as the project does not exceed one mile in length

Consideration for Exemption: To find out if an activity is exempt, “Preliminary Exemption Assessment” is prepared which assists in the determination. After the Water Agency approval of an exempt project (Local Guidelines 2002), the filing of a Notice of Exemption with the County Clerk is recommended. This starts a 35-day statute of limitations. These documents are kept on file at the District offices and are considered public record. If a categorical exemption is not filed, the period for legal challenge is 180 days.

4.5.8 INITIAL STUDY

If an exemption is not appropriate for your project, an Initial Study is prepared to ascertain whether the project may have a substantial adverse effect on the environment, regardless of whether the overall effect of the project is beneficial. An Initial Study contains the project description, location, environment setting and a standardized questionnaire/checklist

considering all phases of the project especially construction and operation. Detailed responses supported by facts, technical studies and other information are required.

The Initial Study determines whether a Negative Declaration, Mitigated Declaration, or Environmental Impact Report (EIR) is appropriate. If an EIR will not be prepared, a "Notice of Intent to Adopt the Negative Declaration or Mitigated Declaration" is submitted to the County Clerk, posted in the appropriate newspapers, and sent to the appropriate Environmental Agencies. Any person or group who has requested in writing to be notified by the District that such environmental documents being filed by the Water Agency would also be sent a copy of this filing.

4.5.9 NEGATIVE DECLARATION

When the results of the Initial Study and other research indicate that the project would have no significant or potentially significant adverse environmental effect, a Negative Declaration is prepared. This document is a written statement that briefly describes the project and its location and gives the reasons why the project will not have a significant effect on the environment and therefore does not require an EIR.

4.5.10 MITIGATED NEGATIVE DECLARATION

A Mitigated Negative Declaration is filed when the Initial Study has identified potentially significant effects for a project and:

1. Revisions in the project plans or proposals made before the report is released for public review that would avoid the effects or mitigate the effects to a level of 'no significant effect' to the environment.
2. There is no substantial evidence in light of the whole record that the project, as it has been revised, may have a significant effect on the environment.

Environmental consultants are sometimes used to assist in preparation of the Initial Study documents as well as any biological, cultural, noise, traffic, or other technical studies as necessary.

The process for the filing of both Negative Declaration and Mitigated Negative Declaration are similar. The process varies within each Water Agency and is fully described in each Water Agency's Local Guidelines.

Any comments received during the public review period are presented to the Governing Board of the Water Agency together with the written staff responses. The Governing Board reviews and takes action to approve or disapprove of Adopting the Negative Declaration or Mitigated Negative Declaration. Upon approval, a Notice of Determination is prepared and filed with the County Clerk together with the appropriate filing fees within five days of Governing Board approval. This begins a 30-day statute of limitations for legal challenges to be filed.

4.5.11 EIR (ENVIRONMENTAL IMPACT REPORT)

If the Water Agency determines that a project is not exempt and potentially causes significant effects on the environment that could not be addressed in a Mitigated Negative Declaration, an EIR must be prepared (CEQA Guidelines 15064).

An EIR is a detailed informational document that identifies and analyzes significant environmental effects of a project, identifies possible alternatives, and discloses mitigation measures to avoid or reduce environmental damage. There are several types of EIRs depending on the intention and scope of the project and whether a previous EIR was prepared.

The primary purpose of an EIR is to inform the decision-makers and the public of the project's environmental effects and ways to reduce the significant effects.

Timing for completion depends a great deal on the project and type of EIR being prepared.

The Water Agency Governing Board must consider the EIR when making a decision on whether or not to approve a project. If the project would have significant unmitigated impacts, some of the alternatives available to the decision makers include:

- Change the project
- Impose conditions on the approval
- Choose an alternative analyzed in the EIR
- Disapprove the project
- Find for overriding considerations

Legal counsel and environmental consultants may have many more alternatives to include depending on the individual project.

Planning for CEQA review early in the project development will help reduce the time needed to prepare the project for Board approval.

Remember, when reading the CEQA guidelines that the terms 'must' and 'shall' are mandatory statements. The term 'may' is permissive and gives discretion to the Board of Directors. The term 'should' identifies the guidance of the Office of Planning and Research.

4.5.12 MSCP/NCCP/SUB-REGIONAL AND SUB-AREA PLANS

Various pieces of legislation have been passed in an attempt to streamline processes while maintaining high standards in conservation requirements. One significant ruling allows for regional and area plans that would attain connectivity and corridors for endangered species while allowing development.

- Habitat Conservation Plan (HCP) in south coastal San Diego County.
- Multiple Habitat Conservation Program (MHCP) in north coastal San Diego County
- Multi-Species Conservation Program (MSCP) in eastern mountains and desert and north central San Diego County.
- Natural Community Conservation Plan (NCCP).

The Joint Water Authority (JWA): was formed by four water agencies (Padre Dam Municipal Water District, Helix Water District, Sweetwater Authority, and Santa Fe Irrigation District). The JWA developed a sub-regional plan under the NCCP. The sub-regional plan is expandable to include additional partners in the future. The goal is to contribute to the persistence of all species within the vicinity of the agencies' lands while securing each Water Agency's ability to operate its vital water operations. This environmental document will serve as an umbrella to each of the member agency's sub-area plans. The study area includes land owned and easements held by each of the participating water agencies, consisting of land used directly for water production, distribution pipelines, collection, storage, and treatment as well as existing habitat preserves and managed conservation areas.

The Sub-regional Plan and each Sub-area Plan is submitted to the Wildlife Agencies and through negotiations is adopted to address how lands will be managed to conserve natural habitats and species while continuing to provide their services to the public. These documents will allow the state and federal wildlife agencies to issue 'take authorizations' for individual water agency projects, so long as the projects comply with the plans' guidelines. When implemented, the sub-regional plans will create a connected habitat preserve system.

Each sub-area plan fulfills the mandatory requirements of an HCP and allows the issuance of permits for the Incidental Take of threatened or endangered species and allows the inclusion of non-listed species.

The sub-area plans do not replace the need to develop the CEQA process for each project. Rather, the intent is to streamline the process by pre-authorizing the mitigation measures for threatened/endangered species allowing the agencies to readily apply for the other necessary permits, to complete the documentation, and begin the project. Species impacts and mitigation will be covered by the NCCP provided the project is consistent with the plan guidelines. Note; Wetland or streambed impacts are not covered by the NCCP. These permits will need to be sought individually.

“The sub-area plans are binding; contractual agreements signed by the participating water agency and the wildlife agencies. It identifies the responsibilities to implement the sub-area plan (e.g. monitoring, management, and reporting responsibilities), binds the parties to their respective obligations, and specifies remedies should any party fail to perform its obligations.” This contract will be in effect for fifty (50) years at which time the plan will be reviewed for additional amendment and continuation. Projects not covered by the original plan may be added through a specified amendment process.

4.5.13 CEQA SPRING UPDATES AND OTHER SEMINARS

The Association of Environmental Professionals (AEP) and other organizations like the UCLA Extension Classes present a variety of workshops and seminars throughout the year usually geared toward those just entering the field or who would like a basic understanding of the CEQA process.

Each spring AEP presents the Annual Spring Update. This seminar is the most important seminar for the District representative to attend. Changes to the CEQA process, changes to the laws and some case study summaries are reviewed by attorneys and environmental consultants.

For information regarding dates for the Spring Update Seminar or other organization information contact:

AEP
P.O. Box 82604
San Diego, CA 92138

State AEP telephone: (916) 737 2371

<http://www.sandiegoaep.org/events.htm>

Each fall AEP presents a Fall Seminar that provides an introduction to the CEQA process.

4.5.14 CEQA (NEPA) ENVIRONMENTAL AGENCIES AND PERMITS

For locations and Phone Numbers refer to this Section.

Regional Water Quality Control Board	Section 401 Permit (State Water Quality Certification) is needed to make use of any national 404 permit.
California Department of Fish and Game (CDFG)	Section 1600 Streambed Alteration Agreement Section 2081 Permit (Authorization of Take for State Threatened/Endangered Species)
U. S. Fish and Wildlife Service	Section 7, 10(A) or 4(D)
U.S. Army Corps of Engineers	Section 404 Permit (Dredge/Fill Discharge Permit)
Federal Emergency Management	Flood Zones

Agency	
OPR – Office of Planning and Research (California State Government Office) also known as the State Clearinghouse	Used if State Agency is involved in project
California Coastal Commission	
San Diego Air Pollution Control District (APCD)	Authority to Construct Permit to Operate
State Historic Preservation Officer (SHPO)	Section 106 Permit
State Water Resources Control Board)	National Pollution Discharge Elimination System (NPDES)
Local Agency Formation Commission (LAFCO)	Annexation and Sphere of Influence

4.5.15 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Under CEQA, any potentially significant effects associated with a project must be reviewed for impact avoidance or mitigation.

A Mitigation Monitoring Reporting Program (MMRP) is developed as part of the environmental process for those projects found to have environmental impacts to make sure that provisions are implemented. Mitigation measures are incorporated verbatim into the plan specifications and the Contract Documents unless the Project Manager and Senior Planner approve modified wording.

A. Biological Resources:

Biological Monitoring could be a requirement if work is planned in or near an area containing sensitive plants or animals. Even during design phase, studies such as those for corrosion, geotechnical and hazardous waste may require the use of equipment that produce loud noises or can damage natural habitat (drill rigs, backhoes, trucks, etc.). When these activities are proposed on un-graded and undeveloped land, the Project Manager and Environmental Agent should determine any biological constraints for compliance with Section 7 or 10a of the Endangered Species Act for threatened or endangered species. This might entail the use of Biological Monitors for the design field-work. When using a consultant, typically a two week notice to facilitate the coordination of the monitoring services is needed.

Monitors have the authority to temporarily stop work if a situation arises where a threatened or endangered species could be harmed. The situation must be resolved before work can be allowed to resume and usually involve the Project Manager, Water District Environmental Agent and possibly the environmental consultants. Biweekly reports are submitted to the Project Manager and/or Environmental Agent for the District.

Should the area in or near the project contain sensitive plants or animals, monitoring may be required during construction. Monitoring stipulations contained in the CEQA document and/or Biological Opinion must be incorporated into the Contract Documents.

B. Cultural Resources:

Potholing or excavating above an existing underground utility can be assumed not to impact archeological or paleontological resources. In undisturbed areas, a monitor may be required and the Project Manager needs to ensure environmental compliance in these areas during design field work and during construction. Monitoring requirements should be noted on construction plans and should be described in Contract Documents.

C. Noise and Air Quality

The potential effects of project-related noise impacts (including 'airblasts' from explosives) and air quality impacts and measures to reduce any significant impacts are typically discussed in the CEQA document. These are incorporated into site-specific control and mitigation measures and included in the Contract Documents. A review of the governing ordinances for the project area will give the parameters to be used in construction.

D. Water Resources

All CIP projects are designed in compliance with 1) water quality objectives established by the Regional Water Quality Control Board (RWQCB), San Diego Region; 2) Federal and State antidegradation policies; and 3) the Federal Clean Water Act.

As of March 2003, a project involving disturbance of more than one acre must comply with the General Construction Storm Water Permit of the RWQCB.

4.5.16 HAZARDOUS MATERIALS

Hazardous Materials site records are researched to minimize to the extent possible the need to acquire or traverse areas where hazardous wastes are suspected or verified.

Districts are encouraged to develop communication programs and materials to provide a process for two-way communication with communities affected by CIP projects. This program could include 24-hour hotline, project presentations to community groups, ad placements, public meetings and mailing notices. Community input should be incorporated as early in the design process as possible.

4.5.17 PRE-CONSTRUCTION FIELD EDUCATION REQUIREMENTS

The San Diego County Water Authority (CWA) developed an environmental training program and produced a Field Guideline Handout for District Inspectors and Superintendents. The field guide gives a list of general environmental work practices. All Water Agency field personnel are required to understand and follow these requirements. The Field Guide is a small laminated flip-chart that should be in every field vehicle for easy access. The field guide pages cover the following topics:

- Ground Rules
- Water Quality and Erosion Control
- Best Management Practices
- Hazardous Materials Management
- Endangered Species
- Cultural Resources
- Air Quality
- Emergency Contacts

Note: The handout is a general description and does not include all available acceptable measures. Project-specific or site-specific conditions will determine the best methods to use. Questions regarding environmental responsibilities should be directed to the supervisor before any action is taken.

The JWA NCCP requires pre-construction training on any project related to biological issues. CEQA requires a pre-construction education program be presented prior to the start of construction of a project for contractors, supervisors, inspectors, and crew chiefs. The project manager, environmental staff person, biological consultant and any other project specific expert will present the education program to review best management practices,

present specific site issues and avoidance measures. A dated attendance roster should be passed out for signature by all attendees to this meeting and held with the environmental papers in the project file.

Once the pre-construction education meeting is complete, the construction contractor/supervisor is responsible for making sure any new additions to the crew(s) coming onto the job are fully apprised of the conditions of the project.

4.5.18 REFERENCE

- A. Should the reader have any suggestions or questions concerning the material in this section, contact one of the member agencies listed.
- B. The publications listed below form a part of this section to the extent referenced and are referred to in the text by the basic designation only. Reference shall be made to the latest edition of said publications unless otherwise called for. The following list of publications, as directly referenced within the body of this document, has been provided for the users convenience. It is the responsibility of the user of these documents to make reference to and/or utilize industry standards not otherwise directly referenced within this document.
 - 1. CEQA Guidelines:

Local Guidelines for Implementing the California Environmental Quality Act by Best, Best & Krieger LLP

CEQA Deskbook by Ronald E. Bass, Albert I. Herson, and Kenneth M. Bogdan published by Solano Press Books
 - 2. San Diego County Water Authority Environmental Field Guide prepared by Essex Environmental
 - 3. California Environmental Quality Statutes (Public Resources Code, Division 13 ** 2100-2177)

APPENDIX
CONTACT INFORMATION

San Diego County Water Authority	4677 Overland Ave San Diego, CA 92123	858 522 6600 website: www.sdcwa.org
California Regional Water Quality Control Board	Local: 9174 Sky Park Court San Diego CA 92123	Office 858 467 2952 fax: 858 571 6972
State Water Resources Control Board	State Water Resources Control Board – Water Quality Division Attn: Storm Water Permits P.O. Box 1977 Sacramento, CA 95812	local contact –Whitney J. Gorham 619 467 2967 916 657 0941
California Department of Fish and Game (CDFG)	Local: Environmental Services Div. 4949 Viewridge Drive San Diego, CA 92123 Main: 330 Golden Shore Suite 50 Long Beach, CA 90802	Issues: Contact Plant: 858 767 3384 Animal: 858 675 0124 Animal: 858 525 4215 Entry/Easement: 310 590 5192 NCCP: 858 467 4212 (310) 590 5137

U. S. Fish and Wildlife Service	6010 Hidden Valley Road Carlsbad, CA 92008	(760) 431 9440 fax: 760 431 9624
U.S. Army Corps of Engineers	16885 Rancho Bernardo Rd Suite 300A San Diego, CA 92127-2107	858 674 5384 fax: 858 674 5388
Federal Emergency Management Agency	Building 105 Presidio of San Francisco San Francisco, CA 94129 Karen Armes, Acting Regional Director	
OPR – Governor’s Office of Planning and Research (California State Government Office) also known as the State Clearinghouse	1400 Tenth Street Sacramento, CA 95814 Loretta Lynch, Director Terry Roberts, Sr. Planner	916 445 0613 fax: 916 323 3018 website: www.ceres.ca.gov/clearinghouse.html
California Coastal Commission	7575 Metropolitan Drive Suite 103 San Diego, CA 92108-4402	(619) 767-2370 fax: (619) 767-2384 website: www.coastal.ca.gov/index.html
San Diego Air Pollution Control District (APCD)	9150 Chesapeake Drive San Diego, CA 92123	858 694 3307 fax: 858 694 2730
State Historic Preservation Officer (SHPO) California Department of Parks and Recreation Office of Historic Preservation	P.O. Box 942896 Sacramento, CA 94296-0001	916-653-6624 Fax: 916-653-9824 calshpo@ohp.parks.ca.gov
Local Agency Formation Commission (LAFCO)	County Administration Center 1600 Pacific Highway, Room 452 San Diego, CA, 92101, USA	(619) 531-5400
County of San Diego Planning and Land Use Dept	5201 Ruffin Road San Diego, CA 92123	858 694-2960

END OF SECTION