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ATTORNEYS FOR SAN ALTOS – LEMON GROVE, LLC

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN DIEGO REGION

IN THE MATTER OF: ADMINISTRATIVE CIVIL LIABILITY COMPLAINT NO. R9-2015-0110 AGAINST SAN ALTOS – LEMON GROVE, LLC	**DECLARATION OF S. WAYNE ROSENBAUM IN SUPPORT OF SAN ALTOS – LEMON GROVE, LLC'S LEGAL AND TECHNICAL ARGUMENTS AND ANALYSIS IN OPPOSITION TO ADMINISTRATIVE CIVIL LIABILITY COMPLAINT NO. R9-2015-0110**

I, S. WAYNE ROSENBAUM, hereby declare as follows:

1. I am a Partner with the law firm of Opper & Varco, and was hired to represent San Altos – Lemon Grove, LLC ("San Altos") in October of 2015 regarding the Administrative Civil Liability Complaint ("ACLC") No. R9-2015-0110 issued on October 19, 2015.

2. Based on a review of publicly available documents, it appears that this ACLC is the first enforcement action alleging violations of the Construction General Permit 2009-2009-DWQ (the "Permit") to go to hearing in front of the San Diego Regional Board ("Regional Board" or "RWQCB") since the adoption of the Permit in 2009 and the State Water Resources Control Board's ("State Board") adoption of its Water Quality Enforcement Policy ("Enforcement Policy").

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3. As stated to San Altos' counsel by Counsel for San Diego Regional Board Prosecution Team ("Prosecution") in this matter, one of the purposes of this ACLC is to send a message to the development industry that El Niño storms were expected during the 2015-16 wet season, and RWQCB staff responsible for enforcement of the Permit wanted to make an example of San Altos to help ensure compliance by other developers.

4. The ACLC alleges 130 non-discharge violations, 50 of which are based on the same alleged deficiencies cited in the December 19, 2014 Notice of Violation No. R9-2014-0153 ("NOV"). These alleged deficiencies include purported violations Sections B.1.a., B.1.b., B.2.f, B.3.a, B.3.b, D.2, E.1, E.3, E.4, and F of Attachment D of the Permit. After reviewing Exhibits 2, 3, 4, 5, 8, and 24 of the Technical Analysis to the ACLC, it appears seven of these alleged violations appear to be based on the inspection report of Wayne Chiu from the December 15, 2014 inspection of the Site. An additional seven of the alleged violations appear to be based on the inspection repots of Tad Nakatani from inspections conducted at the Site on December 9 and December 16. Seventeen of the alleged violations appear to be based on inspections or site visits conducted by Gary Harper on December 1, 2, 4 and 8. The remaining nineteen alleged violations occurring between December 1 and December 19 do not appear to be supported by these or any other exhibits provided as part of the Technical Analysis to the ACLC.

5. The BMP protections required for active areas when there is less than a 50% chance of precipitation is dictated by the Permit, and informed by industry standards such as the CASQA Construction Stormwater BMP Handbook ("CASQA Handbook"). "Active" and "inactive" are defined in Appendix 5 of the Permit on pages 1 and 4, respectively. A true and correct copy of pages 1 and 4 of Appendix 5 of the Permit is attached to this declaration as Exhibit A. Examples of how Permit requirements can differ for active and inactive areas can be found on pages 1 through 6 of Attachment D of the Permit. A true and correct copy of pages 1 through 6 of Attachment D of the Permit is attached to this declaration as Exhibit B. Guidance on protection of active and inactive areas prior to rain events can also be found in Section 3 of the CASQA Handbook. A true and correct copy of page 3-1 of the CASQA Handbook is attached to this declaration as Exhibit C.

6. The ACLC often fails to appropriately consider or cite reputable weather data when alleging violations or calculating penalties. A true and correct copy of National Weather Service Forecast Office precipitation data from EW3680 (Latitude 32.73867, Longitude -117.02983) in Lemon Grove for 2014 and 2015 is attached to this declaration as Exhibit D, and can be accessed online at http://www.wrh.noaa.gov/sgx/obs/rtp/lemon.html. For those dates in 2015 where data is unavailable from EW3680, San Altos has supplemented this with data from the National Weather Service Forecast Office from D5256 (Latitude 32.76630, Longitude -117.01335) in La Mesa. A true and correct copy of this precipitation data for La Mesa in 2015 is attached to this declaration as Exhibit E, and can be accessed online at http://www.wrh.noaa.gov/sgx/obs/rtp/rtp_LMA_15. Based on San Altos' review of the data in Exhibits D and E, San Altos believes it did not rain at San Altos – Valencia Hills project site ("Site") on a number of days, including but not limited to the following:

- December 5, 2014
- December 6, 2014
- December 7, 2014
- December 8, 2014
- December 9, 2014
- December 10, 2014
- January 7, 2015
- January 8, 2015
- January 9, 2015
- January 13, 2015
- January 14, 2015
- March 16, 2015
- March 17, 2015
- March 18, 2015
- March 19, 2015
- March 20, 2015

- March 21, 2015
- March 22, 2015
- March 23, 2015
- March 24, 2015
- March 25, 2015
- March 26, 2015
- March 27, 2015
- March 28, 2015
- March 29, 2015
- March 30, 2015
- March 31, 2015
- April 1, 2015
- April 2, 2015
- April 3, 2015
- May 10, 2015
- May 11, 2015
- May 12, 2015
- May 13, 2015

7. The Prosecution's policy for determining penalties in the ACLC was purportedly derived from the Enforcement Policy. The Enforcement Policy asserts "[i]t is the policy of the State Water Board that the [Regional Boards] shall strive to be fair, firm, and consistent in taking enforcement actions throughout the State, while recognizing the unique facts of each case" on page 2, and proceeds to define some key factors as to how it will achieve these policy goals. A true and correct copy of page 2 of the Enforcement Policy explaining this policy is attached to this declaration as Exhibit F.

8. The Enforcement Policy includes specific provisions on pages 17 and 18 for enforcing multiple violations resulting from the same incident and enforcing violations occurring over multiple days. A true and correct copy of pages 17 and 18 of the Enforcement Policy

explaining this policy is attached to this declaration as Exhibit G. In situations where multiple violations result from the same incident, the policy allows the Regional Board to asses a single base liability amount for multiple violations. Had this been used for San Altos, the number of alleged violations would have been reduced to 42 as shown on Exhibit A to the Legal and Technical Arguments in Opposition to Administrative Civil Liability Complaint NO. R9-2015-0110. A true and correct copy of pages 17 and 18 of the Enforcement Policy explaining this policy is attached to this declaration as Exhibit G.

9. In the matter of Administrative Civil Liability Against the City of Encinitas Complaint No. R9-2013-0152 ("Encinitas ACLC"), the Prosecution applied the multiple day violation policy, which can be found on page 18 of the Enforcement Policy, which is included in Exhibit G to this declaration. For purposes of calculating violations on multiple days, a total base liability is calculated for the first day of the violation. This number is then multiplied by the sum the first day plus one day for each five-day period up to thirty days plus one day for each thirty days thereafter. Thus, a violation lasting ninety-nine days would accrue a penalty of the total base liability for day times 9 days for days 1, 5, 10, 15, 20, 25, 30, 60 and 90.

The San Altos ACLC alleges 130 non-discharge violations over 167 days. Had the Prosecution applied this approach for San Altos' number of alledged violations, the total number days worth of non-discharge violations would be reduced to 13 days of non-discharge violation. Being consistent with the approach used in the Encinitas ACLC, application of the Enforcement Policy's multiple day violation provisions would result in a total of 17 alleged violations against San Altos including both discharge and non-discharge violations.

10. BCT is a technology-based standard for the discharge from existing industrial point sources of conventional pollutants including, total suspended sediment (TSS). BCT is defined in Appendix 5 of the Permit at pages 1 and 2. A true and correct copy of pages 1 and 2 of Appendix 5 to the Permit is attached as Exhibit H. The Permit explains on page 15 of the "Fact Sheet" that measuring turbidity shall function as a proxy measurement for total suspended sediment TSS A true and correct copy of page 15 of the Permit Fact Sheet is attached to this declaration as Exhibit I. The Permit defines the Numeric Action Level ("NAL") for Risk Level 2

dischargers such as San Altos as 250 NTUs. A true and correct copy of page 31 of the Permit is attached to this declaration as Exhibit J.

11. The original Draft Hearing Procedures proposed with the ACLC on October 19, 2015 proposed this matter be presented for hearing on December 16, 2015, and that each side be allowed a total of twenty minutes to present evidence, cross-examine witnesses, and provide a closing statement. A true and correct copy of the original Proposed Draft Hearing Procedures is attached to this declaration as Exhibit K. On December 28, 2015 the Regional Board agreed to extend the timeline for the hearing in the Revised Hearing Procedure to March 9, 2016, allowing each side ninety minutes to present evidence, cross-examine witnesses, and provide a closing statement. A true and correct copy of the Revised Hearing Procedures is attached to this declaration as Exhibit L.

12. On February 2, 2016, 32 hours prior to the deadline for San Altos to submit its Legal and Technical Arguments to the Technical Arguments and Analysis in Opposition to Administrative Civil Liability Complaint .NO. R9-2015-0110, Laura Drabrant, legal counsel to the Prosecution, sent an e-mail to Catherine Hagan, legal counsel for the ACLC Advisory Team requesting that the Prosecution be permitted to submit new evidence, which had not previously been relied upon in support of the ACLC. A true and correct copy of this e-mail is attached hereto as Exhibit M.

13. On February 2, 2016, counsel for San Altos sent an e-mail objecting to the introduction of new evidence without being granted sufficient time to review and address these new materials. A true and correct copy of this e-mail is attached hereto as Exhibit N.

14 On February 2, 2016, twenty-four hours prior to the prior to the deadline for San Altos to submit its Legal and Technical Arguments to the Technical Arguments and Analysis in Opposition to Administrative Civil Liability Complaint NO. R9-2015-0110, Ms. Hagan responded to the Prosecution's request by allowing the Prosecution Team "to submit to the Advisory Team the proposed evidence (electronically and one hard copy) together with a response to the Discharger's objections. The Prosecution Team's response should explain why the Discharger will not be prejudiced by the submittal, why the evidence was not submitted

earlier, and confirm that the evidence is not submitted to support changes to the complaint." A true and correct copy of Ms. Hagan's e-mail is attached hereto as Exhibit O.

15. Counsel for San Altos has determined that to properly address any new evidence as this late date would require at least four (4) additional months to review the evidence and conduct additional discovery including but not limited to additional depositions of RWQCB staff and third parties.

16. Counsel for San Altos estimates the additional cost to its client to adequately defend against this new evidence will cost in excess of $100,000.

17. Counsel for San Altos believes that to allow additional new evidence to be submitted at this time violates San Altos' due process rights, as set forth in Title 23 of the California Code of Regulations section 648.4 and the hearing procedures set forth by the advisory team in Exhibits K and L attached hereto which state

"In accordance with Title 23, California Code of Regulations, section 648.4, the San Diego Water Board endeavors to avoid surprise testimony or evidence. Absent a showing of good cause and lack of prejudice to the parties, the San Diego Water Board may exclude evidence and testimony that is not submitted in accordance with this hearing procedure. Excluded evidence and testimony will not be considered by the San Diego Water Board and will not be included in the administrative record for this proceeding."

18. Photographic evidence demonstrates that the already disturbed and significantly sloped Site was polluted with trash and surrounded by heavily eroded asphalt and dirt roads that were undoubtedly the source of continuous and unmitigated discharge into the adjacent drainage canal and neighboring streets for many years. A true and correct copy of this photographic evidence is attached to this declaration as Exhibit P.

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I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct.

Executed this 3 day of February, 2016 at San Diego, California.

S. Wayne Rosenbaum
Attorney for San Altos – Valencia Hills, LLC
Opper & Varco, LLP

APPENDIX 5:
Glossary

Active Areas of Construction
All areas subject to land surface disturbance activities related to the project including, but not limited to, project staging areas, immediate access areas and storage areas. All previously active areas are still considered active areas until final stabilization is complete. [The construction activity Phases used in this General Permit are the Preliminary Phase, Grading and Land Development Phase, Streets and Utilities Phase, and the Vertical Construction Phase.]

Active Treatment System (ATS)
A treatment system that employs chemical coagulation, chemical flocculation, or electrocoagulation to aid in the reduction of turbidity caused by fine suspended sediment.

Acute Toxicity Test
A chemical stimulus severe enough to rapidly induce a negative effect; in aquatic toxicity tests, an effect observed within 96 hours or less is considered acute.

Air Deposition
Airborne particulates from construction activities. .

Approved Signatory
A person who has legal authority to sign, certify, and electronically submit Permit Registration Documents and Notices of Termination on behalf of the Legally Responsible Person.

Beneficial Uses
As defined in the California Water Code, beneficial uses of the waters of the state that may be protected against quality degradation include, but are not limited to, domestic, municipal, agricultural and industrial supply; power generation; recreation; aesthetic enjoyment; navigation; and preservation and enhancement of fish, wildlife, and other aquatic resources or preserves.

Best Available Technology Economically Achievable (BAT)
As defined by USEPA, BAT is a technology-based standard established by the Clean Water Act (CWA) as the most appropriate means available on a national basis for controlling the direct discharge of toxic and nonconventional pollutants to navigable waters. The BAT effluent limitations guidelines, in general, represent the best existing performance of treatment technologies that are economically achievable within an industrial point source category or subcategory.

Best Conventional Pollutant Control Technology (BCT)

Final Stabilization
All soil disturbing activities at each individual parcel within the site have been completed in a manner consistent with the requirements in this General Permit.

First Order Stream
Stream with no tributaries.

Flocculants
Substances that interact with suspended particles and bind them together to form flocs.

Good Housekeeping BMPs
BMPs designed to reduce or eliminate the addition of pollutants to construction site runoff through analysis of pollutant sources, implementation of proper handling/disposal practices, employee education, and other actions.

Grading Phase (part of the Grading and Land Development Phase)
Includes reconfiguring the topography and slope including; alluvium removals; canyon cleanouts; rock undercuts; keyway excavations; land form grading; and stockpiling of select material for capping operations.

Hydromodification
Hydromodification is the alteration of the hydrologic characteristics of coastal and non-coastal waters, which in turn could cause degradation of water resources. Hydromodification can cause excessive erosion and/or sedimentation rates, causing excessive turbidity, channel aggradation and/or degradation.

Identified Organisms
Organisms within a sub-sample that is specifically identified and counted.

Inactive Areas of Construction
Areas of construction activity that are not active and those that have been active and are not scheduled to be re-disturbed for at least 14 days.

Index Period
The period of time during which bioassessment samples must be collected to produce results suitable for assessing the biological integrity of streams and rivers. Instream communities naturally vary over the course of a year,and sampling during the index period ensures that samples are collected during a time frame when communities are stable so that year-to-year consistency is obtained. The index period approach provides a cost-effective alternative to year-round sampling. Furthermore, sampling within the appropriate index period will yield results that are comparable to the assessment thresholds or criteria for a given region, which are established for the same index period. Because index

ATTACHMENT D
RISK LEVEL 2 REQUIREMENTS

A. Effluent Standards

[These requirements are the same as those in the General Permit order.]

1. Narrative – Risk Level 2 dischargers shall comply with the narrative effluent standards listed below:

   a. Storm water discharges and authorized non-storm water discharges regulated by this General Permit shall not contain a hazardous substance equal to or in excess of reportable quantities established in 40 C.F.R. §§ 117.3 and 302.4, unless a separate NPDES Permit has been issued to regulate those discharges.

   b. Dischargers shall minimize or prevent pollutants in storm water discharges and authorized non-storm water discharges through the use of controls, structures, and management practices that achieve BAT for toxic and non-conventional pollutants and BCT for conventional pollutants.

2. Numeric – Risk level 2 dischargers are subject to a pH NAL of 6.5-8.5, and a turbidity NAL of 250 NTU.

B. Good Site Management "Housekeeping"

1. Risk Level 2 dischargers shall implement good site management (i.e., "housekeeping") measures for construction materials that could potentially be a threat to water quality if discharged. At a minimum, Risk Level 2 dischargers shall implement the following good housekeeping measures:

   a. Conduct an inventory of the products used and/or expected to be used and the end products that are produced and/or expected to be produced. This does not include materials and equipment that are designed to be outdoors and exposed to environmental conditions (i.e. poles, equipment pads, cabinets, conductors, insulators, bricks, etc.).

   b. Cover and berm loose stockpiled construction materials that are not actively being used (i.e. soil, spoils, aggregate, fly-ash, stucco, hydrated lime, etc.).

c. Store chemicals in watertight containers (with appropriate secondary containment to prevent any spillage or leakage) or in a storage shed (completely enclosed).

d. Minimize exposure of construction materials to precipitation. This does not include materials and equipment that are designed to be outdoors and exposed to environmental conditions (i.e. poles, equipment pads, cabinets, conductors, insulators, bricks, etc.).

e. Implement BMPs to prevent the off-site tracking of loose construction and landscape materials.

2. Risk Level 2 dischargers shall implement good housekeeping measures for waste management, which, at a minimum, shall consist of the following:

a. Prevent disposal of any rinse or wash waters or materials on impervious or pervious site surfaces or into the storm drain system.

b. Ensure the containment of sanitation facilities (e.g., portable toilets) to prevent discharges of pollutants to the storm water drainage system or receiving water.

c. Clean or replace sanitation facilities and inspecting them regularly for leaks and spills.

d. Cover waste disposal containers at the end of every business day and during a rain event.

e. Prevent discharges from waste disposal containers to the storm water drainage system or receiving water.

f. Contain and securely protect stockpiled waste material from wind and rain at all times unless actively being used.

g. Implement procedures that effectively address hazardous and non-hazardous spills.

h. Develop a spill response and implementation element of the SWPPP prior to commencement of construction activities. The SWPPP shall require:

i. Equipment and materials for cleanup of spills shall be available on site and that spills and leaks shall be cleaned up immediately and disposed of properly.

ii. Appropriate spill response personnel are assigned and trained.

i. Ensure the containment of concrete washout areas and other washout areas that may contain additional pollutants so there is no discharge into the underlying soil and onto the surrounding areas.

3. Risk Level 2 dischargers shall implement good housekeeping for vehicle storage and maintenance, which, at a minimum, shall consist of the following:

   a. Prevent oil, grease, or fuel to leak in to the ground, storm drains or surface waters.

   b. Place all equipment or vehicles, which are to be fueled, maintained and stored in a designated area fitted with appropriate BMPs.

   c. Clean leaks immediately and disposing of leaked materials properly.

4. Risk Level 2 dischargers shall implement good housekeeping for landscape materials, which, at a minimum, shall consist of the following:

   a. Contain stockpiled materials such as mulches and topsoil when they are not actively being used.

   b. Contain all fertilizers and other landscape materials when they are not actively being used.

   c. Discontinue the application of any erodible landscape material within 2 days before a forecasted rain event or during periods of precipitation.

   d. Apply erodible landscape material at quantities and application rates according to manufacture recommendations or based on written specifications by knowledgeable and experienced field personnel.

   e. Stack erodible landscape material on pallets and covering or storing such materials when not being used or applied.

5. Risk Level 2 dischargers shall conduct an assessment and create a list of potential pollutant sources and identify any areas of the site where additional BMPs are necessary to reduce or prevent pollutants in storm water discharges and authorized non-storm water discharges. This potential pollutant list shall be kept with the SWPPP and shall identify

all non-visible pollutants which are known, or should be known, to occur on the construction site. At a minimum, when developing BMPs, Risk Level 2 dischargers shall do the following:

a. Consider the quantity, physical characteristics (e.g., liquid, powder, solid), and locations of each potential pollutant source handled, produced, stored, recycled, or disposed of at the site.

b. Consider the degree to which pollutants associated with those materials may be exposed to and mobilized by contact with storm water.

c. Consider the direct and indirect pathways that pollutants may be exposed to storm water or authorized non-storm water discharges. This shall include an assessment of past spills or leaks, non-storm water discharges, and discharges from adjoining areas.

d. Ensure retention of sampling, visual observation, and inspection records.

e. Ensure effectiveness of existing BMPs to reduce or prevent pollutants in storm water discharges and authorized non-storm water discharges.

6. Risk Level 2 dischargers shall implement good housekeeping measures on the construction site to control the air deposition of site materials and from site operations. Such particulates can include, but are not limited to, sediment, nutrients, trash, metals, bacteria, oil and grease and organics.

7. **Additional Risk Level 2 Requirement:** Risk Level 2 dischargers shall document all housekeeping BMPs in the SWPPP and REAP(s) in accordance with the nature and phase of the construction project. Construction phases at traditional land development projects include Grading and Land Development Phase, Streets and Utilities, or Vertical Construction for traditional land development projects.

C. Non-Storm Water Management

1. Risk Level 2 dischargers shall implement measures to control all non-storm water discharges during construction.

2. Risk Level 2 dischargers shall wash vehicles in such a manner as to prevent non-storm water discharges to surface waters or MS4 drainage systems.

3. Risk Level 2 dischargers shall clean streets in such a manner as to prevent unauthorized non-storm water discharges from reaching surface water or MS4 drainage systems.

D. Erosion Control

1. Risk Level 2 dischargers shall implement effective wind erosion control.

2. Risk Level 2 dischargers shall provide effective soil cover for inactive[1] areas and all finished slopes, open space, utility backfill, and completed lots.

3. Risk Level 2 dischargers shall limit the use of plastic materials when more sustainable, environmentally friendly alternatives exist. Where plastic materials are deemed necessary, the discharger shall consider the use of plastic materials resistant to solar degradation.

E. Sediment Controls

1. Risk Level 2 dischargers shall establish and maintain effective perimeter controls and stabilize all construction entrances and exits to sufficiently control erosion and sediment discharges from the site.

2. On sites where sediment basins are to be used, Risk Level 2 dischargers shall, at minimum, design sediment basins according to the method provided in CASQA's Construction BMP Guidance Handbook.

3. **Additional Risk Level 2 Requirement:** Risk Level 2 dischargers shall implement appropriate erosion control BMPs (runoff control and soil stabilization) in conjunction with sediment control BMPs for areas under active[2] construction.

4. **Additional Risk Level 2 Requirement:** Risk Level 2 dischargers shall apply linear sediment controls along the toe of the slope, face of the slope, and at the grade breaks of exposed slopes to comply with sheet flow lengths[3] in accordance with Table 1.

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[1] Inactive areas of construction are areas of construction activity that have been disturbed and are not scheduled to be re-disturbed for at least 14 days.

[2] Active areas of construction are areas undergoing land surface disturbance. This includes construction activity during the preliminary stage, mass grading stage, streets and utilities stage and the vertical construction stage.

[3] Sheet flow length is the length that shallow, low velocity flow travels across a site.

Table 1 - Critical Slope/Sheet Flow Length Combinations

Slope Percentage	Sheet flow length not to exceed
0-25%	20 feet
25-50%	15 feet
Over 50%	10 feet

5. **Additional Risk Level 2 Requirement:** Risk Level 2 dischargers shall ensure that construction activity traffic to and from the project is limited to entrances and exits that employ effective controls to prevent offsite tracking of sediment.

6. **Additional Risk Level 2 Requirement:** Risk Level 2 dischargers shall ensure that all storm drain inlets and perimeter controls, runoff control BMPs, and pollutant controls at entrances and exits (e.g. tire washoff locations) are maintained and protected from activities that reduce their effectiveness.

7. **Additional Risk Level 2 Requirement:** Risk Level 2 dischargers shall inspect on a daily basis all immediate access roads daily. At a minimum daily (when necessary) and prior to any rain event, the discharger shall remove any sediment or other construction activity-related materials that are deposited on the roads (by vacuuming or sweeping).

F. Run-on and Run-off Controls

Risk Level 2 dischargers shall effectively manage all run-on, all runoff within the site and all runoff that discharges off the site. Run-on from off site shall be directed away from all disturbed areas or shall collectively be in compliance with the effluent limitations in this General Permit.

G. Inspection, Maintenance and Repair

1. Risk Level 2 dischargers shall ensure that all inspection, maintenance repair and sampling activities at the project location shall be performed or supervised by a Qualified SWPPP Practitioner (QSP) representing the discharger. The QSP may delegate any or all of these activities to an employee appropriately trained to do the task(s).

2. Risk Level 2 dischargers shall perform weekly inspections and observations, and at least once each 24-hour period during extended storm events, to identify and record BMPs that need maintenance to operate effectively, that have failed, or that could fail to operate as intended. Inspectors shall be the QSP or be trained by the QSP.

Section 3
Erosion and Sediment Control BMPs

3.1 Erosion Control

Erosion control is any source control practice that protects the soil surface and prevents soil particles from being detached by rainfall, flowing water, or wind. Erosion control consists of using project scheduling and planning to reduce soil or vegetation disturbance (particularly during the rainy season), preventing or reducing erosion potential by diverting or controlling drainage, as well as preparing and stabilizing disturbed soil areas. Erosion control BMPs that can be used to fulfill these objectives are shown in Table 3-1. It should be noted that several additional BMPs, such as Check Dams (SE-4) and Fiber Rolls (SE-5) can be used for erosion control, by reducing slope length or steepness, as well as for sediment control (i.e., perimeter control or retention of sediment). These BMPs have been included in this handbook as sediment control BMPs and are shown in **Table 3-2**.

Table 3-1 Erosion Control BMPs

BMP#	BMP Name
EC-1	Scheduling
EC-2	Preservation of Existing Vegetation
EC-3	Hydraulic Mulch[1,5]
EC-4	Hydroseeding[1,5]
EC-5	Soil Binders[1,5]
EC-6	Straw Mulch[1,5]
EC-7	Geotextiles & Mats[1,5]
EC-8	Wood Mulching[4]
EC-9	Earth Dikes and Drainage Swales
EC-10	Velocity Dissipation Devices[4,5]
EC-11	Slope Drains[4]
EC-12	Streambank Stabilization[4]
EC-13	Reserved[2]
EC-14	Compost Blankets[3,5]
EC-15	Soil Preparation / Roughening[3]
EC-16	Non-Vegetative Stabilization[3,5]

1) BMP fact sheet updated in 2009
2) BMP fact sheet removed in 2009 (formerly PAM)
3) New BMP fact sheet added in 2009
4) BMP fact sheet updated in 2011
5) BMP fact sheet updated in 2012

All inactive soil disturbed areas on the project site, and most active areas prior to the onset of rain, must be protected from erosion. Soil disturbed areas may include relatively flat areas as well as slopes. Typically, steep slopes and large exposed areas require the most robust erosion controls; flatter slopes and smaller areas still require protection, but less costly materials may be appropriate for these areas, allowing savings to be directed to the more robust BMPs for steep slopes and large exposed areas. Additional guidance on the selection of temporary slope stabilization methods is provided in Appendix F. To be effective, erosion control BMPs for slopes at disturbed areas must be protected from concentrated flows.

Some erosion control BMPs can be used effectively to temporarily prevent erosion by concentrated flows. These BMPs, used alone or in combination, prevent erosion by intercepting, diverting, conveying, and discharging concentrated flows in a manner that prevents soil detachment and transport. Temporary concentrated flow conveyance controls may be required to direct run-on around or through the project in a non-erodible fashion. Temporary concentrated flow conveyance controls include the following BMPs:

EXHIBIT D

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01/01/14	LMGC1:	LEMON GROVE	427 :	74 /	43 /	0.00 /
01/02/14	LMGC1:	LEMON GROVE	427 :	77 /	45 /	0.00 /
01/03/14	LMGC1:	LEMON GROVE	427 :	73 /	46 /	0.00 /
01/04/14	LMGC1:	LEMON GROVE	427 :	71 /	51 /	0.00 /
01/05/14	LMGC1:	LEMON GROVE	427 :	77 /	47 /	0.00 /
01/06/14	LMGC1:	LEMON GROVE	427 :	75 /	46 /	0.00 /
01/07/14	LMGC1:	LEMON GROVE	427 :	68 /	48 /	0.00 /
01/08/14	LMGC1:	LEMON GROVE	427 :	63 /	44 /	0.00 /
01/09/14	LMGC1:	LEMON GROVE	427 :	63 /	54 /	0.00 /
01/10/14	LMGC1:	LEMON GROVE	427 :	74 /	46 /	0.00 /
01/11/14	LMGC1:	LEMON GROVE	427 :	74 /	47 /	0.00 /
01/12/14	LMGC1:	LEMON GROVE	427 :	67 /	46 /	0.00 /
01/13/14	LMGC1:	LEMON GROVE	427 :	81 /	49 /	0.00 /
01/14/14	LMGC1:	LEMON GROVE	427 :	84 /	49 /	0.00 /
01/15/14	LMGC1:	LEMON GROVE	427 :	85 /	52 /	0.00 /
01/16/14	LMGC1:	LEMON GROVE	427 :	85 /	53 /	0.00 /
01/17/14	LMGC1:	LEMON GROVE	427 :	85 /	54 /	0.00 /
01/18/14	LMGC1:	LEMON GROVE	427 :	81 /	51 /	0.00 /
01/19/14	LMGC1:	LEMON GROVE	427 :	76 /	51 /	0.00 /
01/20/14	LMGC1:	LEMON GROVE	427 :	80 /	51 /	0.00 /
01/21/14	LMGC1:	LEMON GROVE	427 :	78 /	51 /	0.00 /
01/22/14	LMGC1:	LEMON GROVE	427 :	74 /	50 /	0.00 /
01/23/14	LMGC1:	LEMON GROVE	427 :	64 /	42 /	0.00 /
01/24/14	LMGC1:	LEMON GROVE	427 :	66 /	54 /	0.00 /
01/25/14	LMGC1:	LEMON GROVE	427 :	71 /	58 /	0.00 /
01/26/14	LMGC1:	LEMON GROVE	427 :	69 /	52 /	0.00 /
01/27/14	LMGC1:	LEMON GROVE	427 :	70 /	53 /	0.00 /
01/28/14	LMGC1:	LEMON GROVE	427 :	71 /	48 /	0.00 /
01/29/14	LMGC1:	LEMON GROVE	427 :	74 /	47 /	0.00 /
01/30/14	LMGC1:	LEMON GROVE	427 :	61 /	51 /	0.00 /
01/31/14	LMGC1:	LEMON GROVE	427 :	60 /	55 /	0.05 /
02/01/14	LMGC1:	LEMON GROVE	427 :	62 /	45 /	0.00 /
02/02/14	LMGC1:	LEMON GROVE	427 :	61 /	45 /	0.00 /
02/03/14	LMGC1:	LEMON GROVE	427 :	58 /	48 /	0.15 /
02/04/14	LMGC1:	LEMON GROVE	427 :	60 /	46 /	0.00 /
02/05/14	LMGC1:	LEMON GROVE	427 :	62 /	47 /	0.00 /
02/06/14	LMGC1:	LEMON GROVE	427 :	60 /	50 /	0.02 /
02/07/14	LMGC1:	LEMON GROVE	427 :	62 /	52 /	0.28 /
02/08/14	LMGC1:	LEMON GROVE	427 :	66 /	48 /	0.00 /
02/09/14	LMGC1:	LEMON GROVE	427 :	65 /	53 /	0.00 /
02/10/14	LMGC1:	LEMON GROVE	427 :	65 /	51 /	0.00 /
02/11/14	LMGC1:	LEMON GROVE	427 :	76 /	49 /	0.00 /
02/12/14	LMGC1:	LEMON GROVE	427 :	81 /	51 /	0.00 /
02/13/14	LMGC1:	LEMON GROVE	427 :	83 /	53 /	0.00 /
02/14/14	LMGC1:	LEMON GROVE	427 :	83 /	52 /	0.00 /
02/15/14	LMGC1:	LEMON GROVE	427 :	81 /	51 /	0.00 /
02/16/14	LMGC1:	LEMON GROVE	427 :	78 /	50 /	0.00 /
02/17/14	LMGC1:	LEMON GROVE	427 :	72 /	49 /	0.00 /
02/18/14	LMGC1:	LEMON GROVE	427 :	65 /	51 /	0.00 /
02/19/14	LMGC1:	LEMON GROVE	427 :	65 /	54 /	0.00 /
02/20/14	LMGC1:	LEMON GROVE	427 :	86 /	47 /	0.00 /
02/21/14	LMGC1:	LEMON GROVE	427 :	78 /	50 /	0.00 /
02/22/14	LMGC1:	LEMON GROVE	427 :	73 /	51 /	0.00 /
02/23/14	LMGC1:	LEMON GROVE	427 :	71 /	47 /	0.00 /
02/24/14	LMGC1:	LEMON GROVE	427 :	70 /	46 /	0.00 /
02/25/14	LMGC1:	LEMON GROVE	427 :	66 /	54 /	0.00 /
02/26/14	LMGC1:	LEMON GROVE	427 :	66 /	52 /	0.00 /

02/27/14	LMGC1:	LEMON GROVE	427 :	65 /	55 /	0.05 /
02/28/14	LMGC1:	LEMON GROVE	427 :	65 /	59 /	0.33 /
03/01/14	LMGC1:	LEMON GROVE	427 :	62 /	54 /	0.61 /
03/02/14	LMGC1:	LEMON GROVE	427 :	63 /	53 /	0.40 /
03/03/14	LMGC1:	LEMON GROVE	427 :	68 /	48 /	0.00 /
03/04/14	LMGC1:	LEMON GROVE	427 :	67 /	52 /	0.00 /
03/05/14	LMGC1:	LEMON GROVE	427 :	76 /	51 /	0.00 /
03/06/14	LMGC1:	LEMON GROVE	427 :	72 /	55 /	0.00 /
03/07/14	LMGC1:	LEMON GROVE	427 :	69 /	56 /	0.00 /
03/08/14	LMGC1:	LEMON GROVE	427 :	80 /	50 /	0.00 /
03/09/14	LMGC1:	LEMON GROVE	427 :	85 /	53 /	0.00 /
03/10/14	LMGC1:	LEMON GROVE	427 :	78 /	53 /	0.00 /
03/11/14	LMGC1:	LEMON GROVE	427 :	69 /	49 /	0.00 /
03/12/14	LMGC1:	LEMON GROVE	427 :	69 /	52 /	0.00 /
03/13/14	LMGC1:	LEMON GROVE	427 :	64 /	54 /	0.00 /
03/14/14	LMGC1:	LEMON GROVE	427 :	70 /	50 /	0.00 /
03/15/14	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
03/16/14	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
03/17/14	LMGC1:	LEMON GROVE	427 :	73 /	63 /	0.00 /
03/18/14	LMGC1:	LEMON GROVE	427 :	68 /	56 /	0.00 /
03/19/14	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
03/20/14	LMGC1:	LEMON GROVE	427 :	71 /	65 /	0.00 /
03/21/14	LMGC1:	LEMON GROVE	427 :	65 /	57 /	0.00 /
03/22/14	LMGC1:	LEMON GROVE	427 :	63 /	58 /	0.00 /
03/23/14	LMGC1:	LEMON GROVE	427 :	68 /	57 /	0.00 /
03/24/14	LMGC1:	LEMON GROVE	427 :	68 /	63 /	0.00 /
03/25/14	LMGC1:	LEMON GROVE	427 :	64 /	58 /	0.00 /
03/26/14	LMGC1:	LEMON GROVE	427 :	63 /	54 /	0.02 /
03/27/14	LMGC1:	LEMON GROVE	427 :	63 /	53 /	0.04 /
03/28/14	LMGC1:	LEMON GROVE	427 :	68 /	52 /	0.00 /
03/29/14	LMGC1:	LEMON GROVE	427 :	76 /	51 /	0.00 /
03/30/14	LMGC1:	LEMON GROVE	427 :	68 /	56 /	0.00 /
03/31/14	LMGC1:	LEMON GROVE	427 :	64 /	50 /	0.00 /
04/01/14	LMGC1:	LEMON GROVE	427 :	62 /	54 /	0.08 /
04/02/14	LMGC1:	LEMON GROVE	427 :	61 /	50 /	0.23 /
04/03/14	LMGC1:	LEMON GROVE	427 :	67 /	46 /	0.00 /
04/04/14	LMGC1:	LEMON GROVE	427 :	62 /	47 /	0.00 /
04/05/14	LMGC1:	LEMON GROVE	427 :	64 /	51 /	0.05 /
04/06/14	LMGC1:	LEMON GROVE	427 :	77 /	49 /	0.00 /
04/07/14	LMGC1:	LEMON GROVE	427 :	87 /	55 /	0.00 /
04/08/14	LMGC1:	LEMON GROVE	427 :	92 /	61 /	0.00 /
04/09/14	LMGC1:	LEMON GROVE	427 :	93 /	57 /	0.00 /
04/10/14	LMGC1:	LEMON GROVE	427 :	85 /	52 /	0.00 /
04/11/14	LMGC1:	LEMON GROVE	427 :	78 /	57 /	0.00 /
04/12/14	LMGC1:	LEMON GROVE	427 :	65 /	57 /	0.00 /
04/13/14	LMGC1:	LEMON GROVE	427 :	63 /	57 /	0.00 /
04/14/14	LMGC1:	LEMON GROVE	427 :	79 /	55 /	0.00 /
04/15/14	LMGC1:	LEMON GROVE	427 :	75 /	53 /	0.00 /
04/16/14	LMGC1:	LEMON GROVE	427 :	67 /	56 /	0.00 /
04/17/14	LMGC1:	LEMON GROVE	427 :	65 /	56 /	0.00 /
04/18/14	LMGC1:	LEMON GROVE	427 :	69 /	59 /	0.00 /
04/19/14	LMGC1:	LEMON GROVE	427 :	71 /	59 /	0.00 /
04/20/14	LMGC1:	LEMON GROVE	427 :	70 /	57 /	0.00 /
04/21/14	LMGC1:	LEMON GROVE	427 :	75 /	57 /	0.00 /
04/22/14	LMGC1:	LEMON GROVE	427 :	69 /	58 /	0.00 /
04/23/14	LMGC1:	LEMON GROVE	427 :	70 /	53 /	0.00 /
04/24/14	LMGC1:	LEMON GROVE	427 :	70 /	54 /	0.00 /
04/25/14	LMGC1:	LEMON GROVE	427 :	66 /	54 /	0.00 /
04/26/14	LMGC1:	LEMON GROVE	427 :	61 /	54 /	0.24 /
04/27/14	LMGC1:	LEMON GROVE	427 :	66 /	53 /	0.00 /

04/28/14	LMGC1:	LEMON GROVE	427 :	75 /	52 /	0.00 /	
04/29/14	LMGC1:	LEMON GROVE	427 :	92 /	56 /	0.00 /	
04/30/14	LMGC1:	LEMON GROVE	427 :	90 /	66 /	0.00 /	
05/01/14	LMGC1:	LEMON GROVE	427 :	92 /	63 /	0.00 /	
05/02/14	LMGC1:	LEMON GROVE	427 :	94 /	63 /	0.00 /	
05/03/14	LMGC1:	LEMON GROVE	427 :	90 /	61 /	0.00 /	
05/04/14	LMGC1:	LEMON GROVE	427 :	78 /	59 /	0.00 /	
05/05/14	LMGC1:	LEMON GROVE	427 :	65 /	55 /	0.00 /	
05/06/14	LMGC1:	LEMON GROVE	427 :	62 /	56 /	0.00 /	
05/07/14	LMGC1:	LEMON GROVE	427 :	64 /	53 /	0.00 /	
05/08/14	LMGC1:	LEMON GROVE	427 :	65 /	57 /	0.00 /	
05/09/14	LMGC1:	LEMON GROVE	427 :	70 /	54 /	0.00 /	
05/10/14	LMGC1:	LEMON GROVE	427 :	66 /	59 /	0.00 /	
05/11/14	LMGC1:	LEMON GROVE	427 :	76 /	54 /	0.00 /	
05/12/14	LMGC1:	LEMON GROVE	427 :	88 /	57 /	0.00 /	
05/13/14	LMGC1:	LEMON GROVE	427 :	93 /	65 /	0.00 /	
05/14/14	LMGC1:	LEMON GROVE	427 :	97 /	66 /	0.00 /	
05/15/14	LMGC1:	LEMON GROVE	427 :	100 /	69 /	0.00 /	
05/16/14	LMGC1:	LEMON GROVE	427 :	93 /	68 /	0.00 /	
05/17/14	LMGC1:	LEMON GROVE	427 :	73 /	61 /	0.00 /	
05/18/14	LMGC1:	LEMON GROVE	427 :	70 /	61 /	0.00 /	
05/19/14	LMGC1:	LEMON GROVE	427 :	M /	60 /	0.00 /	
05/20/14	LMGC1:	LEMON GROVE	427 :	67 /	58 /	0.00 /	
05/21/14	LMGC1:	LEMON GROVE	427 :	68 /	55 /	0.00 /	
05/22/14	LMGC1:	LEMON GROVE	427 :	65 /	61 /	0.00 /	
05/23/14	LMGC1:	LEMON GROVE	427 :	68 /	60 /	0.00 /	
05/24/14	LMGC1:	LEMON GROVE	427 :	65 /	60 /	0.00 /	
05/25/14	LMGC1:	LEMON GROVE	427 :	72 /	61 /	0.00 /	
05/26/14	LMGC1:	LEMON GROVE	427 :	77 /	61 /	0.00 /	
05/27/14	LMGC1:	LEMON GROVE	427 :	74 /	63 /	0.00 /	
05/28/14	LMGC1:	LEMON GROVE	427 :	73 /	62 /	0.00 /	
05/29/14	LMGC1:	LEMON GROVE	427 :	73 /	62 /	0.00 /	
05/30/14	LMGC1:	LEMON GROVE	427 :	75 /	57 /	0.00 /	
05/31/14	LMGC1:	LEMON GROVE	427 :	78 /	57 /	0.00 /	
06/01/14	LMGC1:	LEMON GROVE	427 :	79 /	59 /	0.00 /	
06/02/14	LMGC1:	LEMON GROVE	427 :	78 /	61 /	0.00 /	
06/03/14	LMGC1:	LEMON GROVE	427 :	84 /	59 /	0.00 /	
06/04/14	LMGC1:	LEMON GROVE	427 :	82 /	61 /	0.00 /	
06/05/14	LMGC1:	LEMON GROVE	427 :	78 /	60 /	0.00 /	
06/06/14	LMGC1:	LEMON GROVE	427 :	72 /	60 /	0.00 /	
06/07/14	LMGC1:	LEMON GROVE	427 :	72 /	60 /	0.00 /	
06/08/14	LMGC1:	LEMON GROVE	427 :	72 /	61 /	0.00 /	
06/09/14	LMGC1:	LEMON GROVE	427 :	74 /	60 /	0.00 /	
06/10/14	LMGC1:	LEMON GROVE	427 :	70 /	63 /	0.00 /	
06/11/14	LMGC1:	LEMON GROVE	427 :	77 /	63 /	0.00 /	
06/12/14	LMGC1:	LEMON GROVE	427 :	76 /	62 /	0.00 /	
06/13/14	LMGC1:	LEMON GROVE	427 :	76 /	62 /	0.00 /	
06/14/14	LMGC1:	LEMON GROVE	427 :	75 /	61 /	0.00 /	
06/15/14	LMGC1:	LEMON GROVE	427 :	75 /	60 /	0.00 /	
06/16/14	LMGC1:	LEMON GROVE	427 :	73 /	59 /	0.00 /	
06/17/14	LMGC1:	LEMON GROVE	427 :	76 /	61 /	0.00 /	
06/18/14	LMGC1:	LEMON GROVE	427 :	71 /	59 /	0.00 /	
06/19/14	LMGC1:	LEMON GROVE	427 :	77 /	56 /	0.00 /	
06/20/14	LMGC1:	LEMON GROVE	427 :	76 /	59 /	0.00 /	
06/21/14	LMGC1:	LEMON GROVE	427 :	74 /	61 /	0.00 /	
06/22/14	LMGC1:	LEMON GROVE	427 :	71 /	64 /	0.00 /	
06/23/14	LMGC1:	LEMON GROVE	427 :	72 /	62 /	0.00 /	
06/24/14	LMGC1:	LEMON GROVE	427 :	73 /	61 /	0.00 /	
06/25/14	LMGC1:	LEMON GROVE	427 :	73 /	63 /	0.00 /	
06/26/14	LMGC1:	LEMON GROVE	427 :	75 /	64 /	0.00 /	

06/27/14	LMGC1:	LEMON GROVE	427 :	71 /	65 /	0.00 /
06/28/14	LMGC1:	LEMON GROVE	427 :	73 /	62 /	0.00 /
06/29/14	LMGC1:	LEMON GROVE	427 :	73 /	63 /	0.00 /
06/30/14	LMGC1:	LEMON GROVE	427 :	74 /	65 /	0.00 /
07/01/14	LMGC1:	LEMON GROVE	427 :	75 /	63 /	0.00 /
07/02/14	LMGC1:	LEMON GROVE	427 :	81 /	65 /	0.00 /
07/03/14	LMGC1:	LEMON GROVE	427 :	83 /	64 /	0.00 /
07/04/14	LMGC1:	LEMON GROVE	427 :	80 /	65 /	0.00 /
07/05/14	LMGC1:	LEMON GROVE	427 :	85 /	67 /	0.00 /
07/06/14	LMGC1:	LEMON GROVE	427 :	88 /	69 /	0.00 /
07/07/14	LMGC1:	LEMON GROVE	427 :	83 /	68 /	0.00 /
07/08/14	LMGC1:	LEMON GROVE	427 :	78 /	66 /	0.00 /
07/09/14	LMGC1:	LEMON GROVE	427 :	80 /	66 /	0.00 /
07/10/14	LMGC1:	LEMON GROVE	427 :	83 /	66 /	0.00 /
07/11/14	LMGC1:	LEMON GROVE	427 :	82 /	67 /	0.00 /
07/12/14	LMGC1:	LEMON GROVE	427 :	80 /	66 /	0.00 /
07/13/14	LMGC1:	LEMON GROVE	427 :	75 /	66 /	0.00 /
07/14/14	LMGC1:	LEMON GROVE	427 :	77 /	66 /	0.00 /
07/15/14	LMGC1:	LEMON GROVE	427 :	70 /	66 /	0.00 /
07/16/14	LMGC1:	LEMON GROVE	427 :	79 /	67 /	0.00 /
07/17/14	LMGC1:	LEMON GROVE	427 :	76 /	67 /	0.00 /
07/18/14	LMGC1:	LEMON GROVE	427 :	77 /	65 /	0.00 /
07/19/14	LMGC1:	LEMON GROVE	427 :	74 /	66 /	0.00 /
07/20/14	LMGC1:	LEMON GROVE	427 :	77 /	67 /	0.00 /
07/21/14	LMGC1:	LEMON GROVE	427 :	82 /	67 /	0.00 /
07/22/14	LMGC1:	LEMON GROVE	427 :	82 /	66 /	0.00 /
07/23/14	LMGC1:	LEMON GROVE	427 :	89 /	64 /	0.00 /
07/24/14	LMGC1:	LEMON GROVE	427 :	85 /	67 /	0.00 /
07/25/14	LMGC1:	LEMON GROVE	427 :	81 /	67 /	0.00 /
07/26/14	LMGC1:	LEMON GROVE	427 :	80 /	67 /	0.00 /
07/27/14	LMGC1:	LEMON GROVE	427 :	88 /	68 /	0.00 /
07/28/14	LMGC1:	LEMON GROVE	427 :	90 /	69 /	0.00 /
07/29/14	LMGC1:	LEMON GROVE	427 :	92 /	69 /	0.00 /
07/30/14	LMGC1:	LEMON GROVE	427 :	86 /	68 /	0.00 /
07/31/14	LMGC1:	LEMON GROVE	427 :	87 /	69 /	0.00 /
08/01/14	LMGC1:	LEMON GROVE	427 :	83 /	68 /	0.00 /
08/02/14	LMGC1:	LEMON GROVE	427 :	79 /	68 /	0.05 /
08/03/14	LMGC1:	LEMON GROVE	427 :	78 /	70 /	0.01 /
08/04/14	LMGC1:	LEMON GROVE	427 :	87 /	70 /	0.00 /
08/05/14	LMGC1:	LEMON GROVE	427 :	85 /	64 /	0.00 /
08/06/14	LMGC1:	LEMON GROVE	427 :	79 /	66 /	0.00 /
08/07/14	LMGC1:	LEMON GROVE	427 :	77 /	65 /	0.00 /
08/08/14	LMGC1:	LEMON GROVE	427 :	75 /	67 /	0.00 /
08/09/14	LMGC1:	LEMON GROVE	427 :	77 /	67 /	0.00 /
08/10/14	LMGC1:	LEMON GROVE	427 :	81 /	63 /	0.00 /
08/11/14	LMGC1:	LEMON GROVE	427 :	82 /	68 /	0.00 /
08/12/14	LMGC1:	LEMON GROVE	427 :	81 /	69 /	0.00 /
08/13/14	LMGC1:	LEMON GROVE	427 :	81 /	69 /	0.00 /
08/14/14	LMGC1:	LEMON GROVE	427 :	85 /	65 /	0.00 /
08/15/14	LMGC1:	LEMON GROVE	427 :	90 /	68 /	0.00 /
08/16/14	LMGC1:	LEMON GROVE	427 :	90 /	69 /	0.00 /
08/17/14	LMGC1:	LEMON GROVE	427 :	89 /	68 /	0.00 /
08/18/14	LMGC1:	LEMON GROVE	427 :	79 /	69 /	0.00 /
08/19/14	LMGC1:	LEMON GROVE	427 :	74 /	67 /	0.00 /
08/20/14	LMGC1:	LEMON GROVE	427 :	77 /	67 /	0.00 /
08/21/14	LMGC1:	LEMON GROVE	427 :	83 /	67 /	0.00 /
08/22/14	LMGC1:	LEMON GROVE	427 :	82 /	65 /	0.00 /
08/23/14	LMGC1:	LEMON GROVE	427 :	83 /	61 /	0.00 /
08/24/14	LMGC1:	LEMON GROVE	427 :	83 /	64 /	0.00 /
08/25/14	LMGC1:	LEMON GROVE	427 :	84 /	67 /	0.00 /

08/26/14	LMGC1:	LEMON GROVE	427 :	85	/	65	/	0.00 /
08/27/14	LMGC1:	LEMON GROVE	427 :	93	/	67	/	0.00 /
08/28/14	LMGC1:	LEMON GROVE	427 :	93	/	68	/	0.00 /
08/29/14	LMGC1:	LEMON GROVE	427 :	86	/	66	/	0.00 /
08/30/14	LMGC1:	LEMON GROVE	427 :	85	/	66	/	0.00 /
08/31/14	LMGC1:	LEMON GROVE	427 :	82	/	66	/	0.00 /
09/01/14	LMGC1:	LEMON GROVE	427 :	76	/	65	/	0.00 /
09/02/14	LMGC1:	LEMON GROVE	427 :	81	/	66	/	0.00 /
09/03/14	LMGC1:	LEMON GROVE	427 :	79	/	69	/	0.00 /
09/04/14	LMGC1:	LEMON GROVE	427 :	80	/	68	/	0.00 /
09/05/14	LMGC1:	LEMON GROVE	427 :	82	/	66	/	0.00 /
09/06/14	LMGC1:	LEMON GROVE	427 :	91	/	68	/	0.00 /
09/07/14	LMGC1:	LEMON GROVE	427 :	88	/	72	/	0.00 /
09/08/14	LMGC1:	LEMON GROVE	427 :	89	/	72	/	0.00 /
09/09/14	LMGC1:	LEMON GROVE	427 :	86	/	74	/	0.00 /
09/10/14	LMGC1:	LEMON GROVE	427 :	87	/	68	/	0.00 /
09/11/14	LMGC1:	LEMON GROVE	427 :	87	/	69	/	0.00 /
09/12/14	LMGC1:	LEMON GROVE	427 :	90	/	68	/	0.00 /
09/13/14	LMGC1:	LEMON GROVE	427 :	94	/	69	/	0.00 /
09/14/14	LMGC1:	LEMON GROVE	427 :	96	/	71	/	0.00 /
09/15/14	LMGC1:	LEMON GROVE	427 :	97	/	72	/	0.00 /
09/16/14	LMGC1:	LEMON GROVE	427 :	103	/	74	/	0.01 /
09/17/14	LMGC1:	LEMON GROVE	427 :	94	/	78	/	0.00 /
09/18/14	LMGC1:	LEMON GROVE	427 :	81	/	71	/	0.00 /
09/19/14	LMGC1:	LEMON GROVE	427 :	81	/	69	/	0.00 /
09/20/14	LMGC1:	LEMON GROVE	427 :	77	/	69	/	0.00 /
09/21/14	LMGC1:	LEMON GROVE	427 :	79	/	67	/	0.00 /
09/22/14	LMGC1:	LEMON GROVE	427 :	82	/	64	/	0.00 /
09/23/14	LMGC1:	LEMON GROVE	427 :	86	/	63	/	0.00 /
09/24/14	LMGC1:	LEMON GROVE	427 :	89	/	65	/	0.00 /
09/25/14	LMGC1:	LEMON GROVE	427 :	89	/	68	/	0.00 /
09/26/14	LMGC1:	LEMON GROVE	427 :	82	/	68	/	0.00 /
09/27/14	LMGC1:	LEMON GROVE	427 :	74	/	61	/	0.00 /
09/28/14	LMGC1:	LEMON GROVE	427 :	73	/	62	/	0.00 /
09/29/14	LMGC1:	LEMON GROVE	427 :	78	/	59	/	0.00 /
09/30/14	LMGC1:	LEMON GROVE	427 :	81	/	61	/	0.00 /
10/01/14	LMGC1:	LEMON GROVE	427 :	75	/	65	/	0.00 /
10/02/14	LMGC1:	LEMON GROVE	427 :	97	/	61	/	0.00 /
10/03/14	LMGC1:	LEMON GROVE	427 :	96	/	63	/	0.00 /
10/04/14	LMGC1:	LEMON GROVE	427 :	94	/	67	/	0.00 /
10/05/14	LMGC1:	LEMON GROVE	427 :	91	/	63	/	0.00 /
10/06/14	LMGC1:	LEMON GROVE	427 :	91	/	66	/	0.00 /
10/07/14	LMGC1:	LEMON GROVE	427 :	91	/	71	/	0.00 /
10/08/14	LMGC1:	LEMON GROVE	427 :	84	/	63	/	0.00 /
10/09/14	LMGC1:	LEMON GROVE	427 :	76	/	67	/	0.00 /
10/10/14	LMGC1:	LEMON GROVE	427 :	79	/	63	/	0.00 /
10/11/14	LMGC1:	LEMON GROVE	427 :	78	/	63	/	0.00 /
10/12/14	LMGC1:	LEMON GROVE	427 :	76	/	61	/	0.00 /
10/13/14	LMGC1:	LEMON GROVE	427 :	77	/	59	/	0.00 /
10/14/14	LMGC1:	LEMON GROVE	427 :	77	/	62	/	0.00 /
10/15/14	LMGC1:	LEMON GROVE	427 :	76	/	66	/	0.00 /
10/16/14	LMGC1:	LEMON GROVE	427 :	76	/	62	/	0.00 /
10/17/14	LMGC1:	LEMON GROVE	427 :	74	/	66	/	0.00 /
10/18/14	LMGC1:	LEMON GROVE	427 :	73	/	63	/	0.00 /
10/19/14	LMGC1:	LEMON GROVE	427 :	76	/	62	/	0.00 /
10/20/14	LMGC1:	LEMON GROVE	427 :	74	/	62	/	0.00 /
10/21/14	LMGC1:	LEMON GROVE	427 :	79	/	65	/	0.00 /
10/22/14	LMGC1:	LEMON GROVE	427 :	83	/	57	/	0.00 /
10/23/14	LMGC1:	LEMON GROVE	427 :	85	/	57	/	0.00 /
10/24/14	LMGC1:	LEMON GROVE	427 :	88	/	60	/	0.00 /

10/25/14	LMGC1:	LEMON GROVE	427 :	79 /	63 /	0.00 /	
10/26/14	LMGC1:	LEMON GROVE	427 :	72 /	63 /	0.00 /	
10/27/14	LMGC1:	LEMON GROVE	427 :	74 /	56 /	0.00 /	
10/28/14	LMGC1:	LEMON GROVE	427 :	77 /	56 /	0.00 /	
10/29/14	LMGC1:	LEMON GROVE	427 :	84 /	58 /	0.00 /	
10/30/14	LMGC1:	LEMON GROVE	427 :	77 /	57 /	0.00 /	
10/31/14	LMGC1:	LEMON GROVE	427 :	70 /	65 /	0.00 /	
11/01/14	LMGC1:	LEMON GROVE	427 :	67 /	60 /	0.38 /	
11/02/14	LMGC1:	LEMON GROVE	427 :	67 /	53 /	0.16 /	
11/03/14	LMGC1:	LEMON GROVE	427 :	73 /	51 /	0.00 /	
11/04/14	LMGC1:	LEMON GROVE	427 :	78 /	49 /	0.00 /	
11/05/14	LMGC1:	LEMON GROVE	427 :	89 /	51 /	0.00 /	
11/06/14	LMGC1:	LEMON GROVE	427 :	91 /	58 /	0.00 /	
11/07/14	LMGC1:	LEMON GROVE	427 :	90 /	60 /	0.00 /	
11/08/14	LMGC1:	LEMON GROVE	427 :	88 /	61 /	0.00 /	
11/09/14	LMGC1:	LEMON GROVE	427 :	76 /	52 /	0.00 /	
11/10/14	LMGC1:	LEMON GROVE	427 :	68 /	59 /	0.00 /	
11/11/14	LMGC1:	LEMON GROVE	427 :	67 /	62 /	0.00 /	
11/12/14	LMGC1:	LEMON GROVE	427 :	68 /	61 /	0.00 /	
11/13/14	LMGC1:	LEMON GROVE	427 :	69 /	60 /	0.00 /	
11/14/14	LMGC1:	LEMON GROVE	427 :	69 /	58 /	0.02 /	
11/15/14	LMGC1:	LEMON GROVE	427 :	68 /	55 /	0.00 /	
11/16/14	LMGC1:	LEMON GROVE	427 :	75 /	55 /	0.00 /	
11/17/14	LMGC1:	LEMON GROVE	427 :	75 /	49 /	0.00 /	
11/18/14	LMGC1:	LEMON GROVE	427 :	78 /	48 /	0.00 /	
11/19/14	LMGC1:	LEMON GROVE	427 :	73 /	48 /	0.00 /	
11/20/14	LMGC1:	LEMON GROVE	427 :	70 /	50 /	0.00 /	
11/21/14	LMGC1:	LEMON GROVE	427 :	69 /	59 /	0.04 /	
11/22/14	LMGC1:	LEMON GROVE	427 :	72 /	51 /	0.00 /	
11/23/14	LMGC1:	LEMON GROVE	427 :	76 /	51 /	0.00 /	
11/24/14	LMGC1:	LEMON GROVE	427 :	80 /	52 /	0.00 /	
11/25/14	LMGC1:	LEMON GROVE	427 :	79 /	51 /	0.00 /	
11/26/14	LMGC1:	LEMON GROVE	427 :	86 /	53 /	0.00 /	
11/27/14	LMGC1:	LEMON GROVE	427 :	89 /	59 /	0.00 /	
11/28/14	LMGC1:	LEMON GROVE	427 :	81 /	56 /	0.00 /	
11/29/14	LMGC1:	LEMON GROVE	427 :	75 /	49 /	0.00 /	
11/30/14	LMGC1:	LEMON GROVE	427 :	70 /	57 /	0.01 /	
12/01/14	LMGC1:	LEMON GROVE	427 :	71 /	54 /	0.00 /	
12/02/14	LMGC1:	LEMON GROVE	427 :	68 /	61 /	0.03 /	
12/03/14	LMGC1:	LEMON GROVE	427 :	66 /	62 /	0.69 /	
12/04/14	LMGC1:	LEMON GROVE	427 :	70 /	63 /	0.98 /	
12/05/14	LMGC1:	LEMON GROVE	427 :	68 /	54 /	0.00 /	
12/06/14	LMGC1:	LEMON GROVE	427 :	72 /	56 /	0.00 /	
12/07/14	LMGC1:	LEMON GROVE	427 :	79 /	54 /	0.00 /	
12/08/14	LMGC1:	LEMON GROVE	427 :	76 /	56 /	0.00 /	
12/09/14	LMGC1:	LEMON GROVE	427 :	77 /	53 /	0.00 /	
12/10/14	LMGC1:	LEMON GROVE	427 :	68 /	51 /	0.00 /	
12/11/14	LMGC1:	LEMON GROVE	427 :	67 /	58 /	0.00 /	
12/12/14	LMGC1:	LEMON GROVE	427 :	62 /	54 /	0.98 /	
12/13/14	LMGC1:	LEMON GROVE	427 :	63 /	50 /	0.30 /	
12/14/14	LMGC1:	LEMON GROVE	427 :	65 /	46 /	0.00 /	
12/15/14	LMGC1:	LEMON GROVE	427 :	63 /	48 /	0.00 /	
12/16/14	LMGC1:	LEMON GROVE	427 :	60 /	52 /	0.28 /	
12/17/14	LMGC1:	LEMON GROVE	427 :	63 /	53 /	0.52 /	
12/18/14	LMGC1:	LEMON GROVE	427 :	63 /	50 /	0.01 /	
12/19/14	LMGC1:	LEMON GROVE	427 :	67 /	49 /	0.00 /	
12/20/14	LMGC1:	LEMON GROVE	427 :	64 /	48 /	0.00 /	
12/21/14	LMGC1:	LEMON GROVE	427 :	70 /	52 /	0.00 /	
12/22/14	LMGC1:	LEMON GROVE	427 :	77 /	50 /	0.00 /	
12/23/14	LMGC1:	LEMON GROVE	427 :	82 /	52 /	0.00 /	

12/24/14	LMGC1:	LEMON GROVE	427 :	75 /	52 /	0.00 /
12/25/14	LMGC1:	LEMON GROVE	427 :	65 /	55 /	0.02 /
12/26/14	LMGC1:	LEMON GROVE	427 :	64 /	46 /	0.00 /
12/27/14	LMGC1:	LEMON GROVE	427 :	63 /	39 /	0.00 /
12/28/14	LMGC1:	LEMON GROVE	427 :	62 /	40 /	0.00 /
12/29/14	LMGC1:	LEMON GROVE	427 :	63 /	43 /	0.00 /
12/30/14	LMGC1:	LEMON GROVE	427 :	57 /	49 /	0.02 /
12/31/14	LMGC1:	LEMON GROVE	427 :	51 /	41 /	0.38 /

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01/01/15	LMGC1:	LEMON GROVE	427 :	58 /	38 /	0.00 /
01/02/15	LMGC1:	LEMON GROVE	427 :	59 /	39 /	0.00 /
01/03/15	LMGC1:	LEMON GROVE	427 :	63 /	42 /	0.00 /
01/04/15	LMGC1:	LEMON GROVE	427 :	69 /	42 /	0.00 /
01/05/15	LMGC1:	LEMON GROVE	427 :	81 /	47 /	0.00 /
01/06/15	LMGC1:	LEMON GROVE	427 :	86 /	49 /	0.00 /
01/07/15	LMGC1:	LEMON GROVE	427 :	79 /	53 /	0.00 /
01/08/15	LMGC1:	LEMON GROVE	427 :	71 /	56 /	0.00 /
01/09/15	LMGC1:	LEMON GROVE	427 :	66 /	56 /	0.00 /
01/10/15	LMGC1:	LEMON GROVE	427 :	71 /	49 /	0.01 /
01/11/15	LMGC1:	LEMON GROVE	427 :	59 /	54 /	0.26 /
01/12/15	LMGC1:	LEMON GROVE	427 :	68 /	57 /	0.03 /
01/13/15	LMGC1:	LEMON GROVE	427 :	68 /	53 /	0.00 /
01/14/15	LMGC1:	LEMON GROVE	427 :	72 /	47 /	0.00 /
01/15/15	LMGC1:	LEMON GROVE	427 :	74 /	49 /	0.00 /
01/16/15	LMGC1:	LEMON GROVE	427 :	74 /	49 /	0.00 /
01/17/15	LMGC1:	LEMON GROVE	427 :	74 /	51 /	0.00 /
01/18/15	LMGC1:	LEMON GROVE	427 :	75 /	51 /	0.00 /
01/19/15	LMGC1:	LEMON GROVE	427 :	70 /	47 /	0.00 /
01/20/15	LMGC1:	LEMON GROVE	427 :	64 /	50 /	0.00 /
01/21/15	LMGC1:	LEMON GROVE	427 :	72 /	54 /	0.00 /
01/22/15	LMGC1:	LEMON GROVE	427 :	75 /	46 /	0.00 /
01/23/15	LMGC1:	LEMON GROVE	427 :	73 /	50 /	0.00 /
01/24/15	LMGC1:	LEMON GROVE	427 :	78 /	46 /	0.00 /
01/25/15	LMGC1:	LEMON GROVE	427 :	76 /	53 /	0.00 /
01/26/15	LMGC1:	LEMON GROVE	427 :	73 /	59 /	0.04 /
01/27/15	LMGC1:	LEMON GROVE	427 :	74 /	54 /	0.00 /
01/28/15	LMGC1:	LEMON GROVE	427 :	75 /	52 /	0.00 /
01/29/15	LMGC1:	LEMON GROVE	427 :	71 /	58 /	0.01 /
01/30/15	LMGC1:	LEMON GROVE	427 :	63 /	57 /	0.01 /
01/31/15	LMGC1:	LEMON GROVE	427 :	67 /	54 /	0.00 /
02/01/15	LMGC1:	LEMON GROVE	427 :	74 /	51 /	0.00 /
02/02/15	LMGC1:	LEMON GROVE	427 :	77 /	52 /	0.00 /
02/03/15	LMGC1:	LEMON GROVE	427 :	75 /	46 /	0.00 /
02/04/15	LMGC1:	LEMON GROVE	427 :	75 /	47 /	0.00 /
02/05/15	LMGC1:	LEMON GROVE	427 :	78 /	48 /	0.00 /
02/06/15	LMGC1:	LEMON GROVE	427 :	79 /	48 /	0.00 /
02/07/15	LMGC1:	LEMON GROVE	427 :	76 /	45 /	0.00 /
02/08/15	LMGC1:	LEMON GROVE	427 :	75 /	55 /	0.00 /
02/09/15	LMGC1:	LEMON GROVE	427 :	73 /	54 /	0.00 /
02/10/15	LMGC1:	LEMON GROVE	427 :	74 /	48 /	0.00 /
02/11/15	LMGC1:	LEMON GROVE	427 :	86 /	54 /	0.00 /
02/12/15	LMGC1:	LEMON GROVE	427 :	85 /	60 /	0.00 /
02/13/15	LMGC1:	LEMON GROVE	427 :	87 /	55 /	0.00 /
02/14/15	LMGC1:	LEMON GROVE	427 :	84 /	63 /	0.00 /
02/15/15	LMGC1:	LEMON GROVE	427 :	80 /	56 /	0.00 /
02/16/15	LMGC1:	LEMON GROVE	427 :	67 /	50 /	0.00 /
02/17/15	LMGC1:	LEMON GROVE	427 :	69 /	56 /	0.00 /
02/18/15	LMGC1:	LEMON GROVE	427 :	71 /	54 /	0.00 /
02/19/15	LMGC1:	LEMON GROVE	427 :	71 /	52 /	0.00 /
02/20/15	LMGC1:	LEMON GROVE	427 :	68 /	57 /	0.00 /
02/21/15	LMGC1:	LEMON GROVE	427 :	64 /	59 /	0.00 /
02/22/15	LMGC1:	LEMON GROVE	427 :	63 /	57 /	0.00 /
02/23/15	LMGC1:	LEMON GROVE	427 :	64 /	52 /	0.32 /
02/24/15	LMGC1:	LEMON GROVE	427 :	68 /	47 /	0.00 /
02/25/15	LMGC1:	LEMON GROVE	427 :	70 /	48 /	0.00 /
02/26/15	LMGC1:	LEMON GROVE	427 :	67 /	46 /	0.00 /

02/27/15	LMGC1:	LEMON GROVE	427 :	65 /	54 /	0.00 /
02/28/15	LMGC1:	LEMON GROVE	427 :	63 /	55 /	0.03 /
03/01/15	LMGC1:	LEMON GROVE	427 :	56 /	52 /	0.83 /
03/02/15	LMGC1:	LEMON GROVE	427 :	60 /	50 /	0.40 /
03/03/15	LMGC1:	LEMON GROVE	427 :	63 /	49 /	0.00 /
03/04/15	LMGC1:	LEMON GROVE	427 :	68 /	47 /	0.00 /
03/05/15	LMGC1:	LEMON GROVE	427 :	76 /	47 /	0.00 /
03/06/15	LMGC1:	LEMON GROVE	427 :	83 /	50 /	0.00 /
03/07/15	LMGC1:	LEMON GROVE	427 :	83 /	55 /	0.00 /
03/08/15	LMGC1:	LEMON GROVE	427 :	73 /	50 /	0.00 /
03/09/15	LMGC1:	LEMON GROVE	427 :	71 /	49 /	0.00 /
03/10/15	LMGC1:	LEMON GROVE	427 :	80 /	51 /	0.00 /
03/11/15	LMGC1:	LEMON GROVE	427 :	78 /	58 /	0.00 /
03/12/15	LMGC1:	LEMON GROVE	427 :	80 /	56 /	0.00 /
03/13/15	LMGC1:	LEMON GROVE	427 :	89 /	64 /	0.00 /
03/14/15	LMGC1:	LEMON GROVE	427 :	92 /	61 /	0.00 /
03/15/15	LMGC1:	LEMON GROVE	427 :	91 /	66 /	0.00 /
03/16/15	LMGC1:	LEMON GROVE	427 :	88 /	68 /	0.00 /
03/17/15	LMGC1:	LEMON GROVE	427 :	81 /	59 /	0.00 /
03/18/15	LMGC1:	LEMON GROVE	427 :	67 /	61 /	0.00 /
03/19/15	LMGC1:	LEMON GROVE	427 :	72 /	60 /	0.00 /
03/20/15	LMGC1:	LEMON GROVE	427 :	77 /	58 /	0.00 /
03/21/15	LMGC1:	LEMON GROVE	427 :	72 /	59 /	0.00 /
03/22/15	LMGC1:	LEMON GROVE	427 :	71 /	54 /	0.00 /
03/23/15	LMGC1:	LEMON GROVE	427 :	69 /	55 /	0.00 /
03/24/15	LMGC1:	LEMON GROVE	427 :	71 /	53 /	0.00 /
03/25/15	LMGC1:	LEMON GROVE	427 :	81 /	54 /	0.00 /
03/26/15	LMGC1:	LEMON GROVE	427 :	89 /	59 /	0.00 /
03/27/15	LMGC1:	LEMON GROVE	427 :	89 /	59 /	0.00 /
03/28/15	LMGC1:	LEMON GROVE	427 :	82 /	56 /	0.00 /
03/29/15	LMGC1:	LEMON GROVE	427 :	76 /	60 /	0.00 /
03/30/15	LMGC1:	LEMON GROVE	427 :	76 /	56 /	0.00 /
03/31/15	LMGC1:	LEMON GROVE	427 :	70 /	58 /	0.00 /
04/01/15	LMGC1:	LEMON GROVE	427 :	71 /	58 /	0.00 /
04/02/15	LMGC1:	LEMON GROVE	427 :	67 /	56 /	0.00 /
04/03/15	LMGC1:	LEMON GROVE	427 :	85 /	54 /	0.00 /
04/04/15	LMGC1:	LEMON GROVE	427 :	80 /	55 /	0.00 /
04/05/15	LMGC1:	LEMON GROVE	427 :	66 /	58 /	0.00 /
04/06/15	LMGC1:	LEMON GROVE	427 :	65 /	54 /	0.00 /
04/07/15	LMGC1:	LEMON GROVE	427 :	65 /	54 /	0.00 /
04/08/15	LMGC1:	LEMON GROVE	427 :	67 /	53 /	0.00 /
04/09/15	LMGC1:	LEMON GROVE	427 :	68 /	51 /	0.00 /
04/10/15	LMGC1:	LEMON GROVE	427 :	68 /	54 /	0.00 /
04/11/15	LMGC1:	LEMON GROVE	427 :	69 /	50 /	0.00 /
04/12/15	LMGC1:	LEMON GROVE	427 :	69 /	53 /	0.00 /
04/13/15	LMGC1:	LEMON GROVE	427 :	73 /	58 /	0.00 /
04/14/15	LMGC1:	LEMON GROVE	427 :	73 /	60 /	0.00 /
04/15/15	LMGC1:	LEMON GROVE	427 :	78 /	52 /	0.00 /
04/16/15	LMGC1:	LEMON GROVE	427 :	80 /	53 /	0.00 /
04/17/15	LMGC1:	LEMON GROVE	427 :	81 /	55 /	0.00 /
04/18/15	LMGC1:	LEMON GROVE	427 :	79 /	53 /	0.00 /
04/19/15	LMGC1:	LEMON GROVE	427 :	74 /	55 /	0.00 /
04/20/15	LMGC1:	LEMON GROVE	427 :	68 /	58 /	0.00 /
04/21/15	LMGC1:	LEMON GROVE	427 :	67 /	59 /	0.00 /
04/22/15	LMGC1:	LEMON GROVE	427 :	65 /	57 /	0.00 /
04/23/15	LMGC1:	LEMON GROVE	427 :	67 /	57 /	0.00 /
04/24/15	LMGC1:	LEMON GROVE	427 :	63 /	56 /	0.04 /
04/25/15	LMGC1:	LEMON GROVE	427 :	64 /	56 /	0.03 /
04/26/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
04/27/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /

04/28/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
04/29/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
04/30/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/01/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/02/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/03/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/04/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/05/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/06/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/07/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/08/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/09/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/10/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/11/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/12/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/13/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/14/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/15/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/16/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/17/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/18/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/19/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/20/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/21/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/22/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/23/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/24/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/25/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/26/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/27/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/28/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/29/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/30/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
05/31/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/01/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/02/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/03/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/04/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/05/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/06/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/07/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/08/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/09/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/10/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/11/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/12/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/13/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/14/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/15/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/16/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/17/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/18/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/19/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/20/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/21/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/22/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/23/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/24/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/25/15	LMGC1:	LEMON GROVE	427 :	81 /	M /	0.00 /
06/26/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /

06/27/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/28/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/29/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /
06/30/15	LMGC1:	LEMON GROVE	427 :	86 /	64 /	0.02 /
07/01/15	LMGC1:	LEMON GROVE	427 :	83 /	68 /	0.00 /
07/02/15	LMGC1:	LEMON GROVE	427 :	84 /	67 /	0.00 /
07/03/15	LMGC1:	LEMON GROVE	427 :	82 /	65 /	0.00 /
07/04/15	LMGC1:	LEMON GROVE	427 :	76 /	66 /	0.00 /
07/05/15	LMGC1:	LEMON GROVE	427 :	73 /	64 /	0.00 /
07/06/15	LMGC1:	LEMON GROVE	427 :	71 /	63 /	0.00 /
07/07/15	LMGC1:	LEMON GROVE	427 :	74 /	63 /	0.00 /
07/08/15	LMGC1:	LEMON GROVE	427 :	71 /	65 /	0.00 /
07/09/15	LMGC1:	LEMON GROVE	427 :	72 /	64 /	0.00 /
07/10/15	LMGC1:	LEMON GROVE	427 :	74 /	62 /	0.00 /
07/11/15	LMGC1:	LEMON GROVE	427 :	76 /	60 /	0.00 /
07/12/15	LMGC1:	LEMON GROVE	427 :	79 /	61 /	0.00 /
07/13/15	LMGC1:	LEMON GROVE	427 :	80 /	61 /	0.00 /
07/14/15	LMGC1:	LEMON GROVE	427 :	74 /	66 /	0.00 /
07/15/15	LMGC1:	LEMON GROVE	427 :	74 /	63 /	0.00 /
07/16/15	LMGC1:	LEMON GROVE	427 :	78 /	64 /	0.00 /
07/17/15	LMGC1:	LEMON GROVE	427 :	82 /	63 /	0.00 /
07/18/15	LMGC1:	LEMON GROVE	427 :	76 /	66 /	0.73 /
07/19/15	LMGC1:	LEMON GROVE	427 :	86 /	71 /	0.58 /
07/20/15	LMGC1:	LEMON GROVE	427 :	78 /	71 /	0.13 /
07/21/15	LMGC1:	LEMON GROVE	427 :	79 /	68 /	0.00 /
07/22/15	LMGC1:	LEMON GROVE	427 :	79 /	70 /	0.00 /
07/23/15	LMGC1:	LEMON GROVE	427 :	81 /	70 /	0.00 /
07/24/15	LMGC1:	LEMON GROVE	427 :	85 /	69 /	0.00 /
07/25/15	LMGC1:	LEMON GROVE	427 :	89 /	66 /	0.00 /
07/26/15	LMGC1:	LEMON GROVE	427 :	81 /	65 /	0.00 /
07/27/15	LMGC1:	LEMON GROVE	427 :	75 /	65 /	0.00 /
07/28/15	LMGC1:	LEMON GROVE	427 :	80 /	62 /	0.00 /
07/29/15	LMGC1:	LEMON GROVE	427 :	78 /	66 /	0.00 /
07/30/15	LMGC1:	LEMON GROVE	427 :	82 /	68 /	0.00 /
07/31/15	LMGC1:	LEMON GROVE	427 :	84 /	69 /	0.00 /
08/01/15	LMGC1:	LEMON GROVE	427 :	79 /	67 /	0.00 /
08/02/15	LMGC1:	LEMON GROVE	427 :	80 /	67 /	0.00 /
08/03/15	LMGC1:	LEMON GROVE	427 :	80 /	67 /	0.00 /
08/04/15	LMGC1:	LEMON GROVE	427 :	88 /	65 /	0.00 /
08/05/15	LMGC1:	LEMON GROVE	427 :	89 /	65 /	0.00 /
08/06/15	LMGC1:	LEMON GROVE	427 :	81 /	67 /	0.00 /
08/07/15	LMGC1:	LEMON GROVE	427 :	77 /	67 /	0.00 /
08/08/15	LMGC1:	LEMON GROVE	427 :	77 /	66 /	0.00 /
08/09/15	LMGC1:	LEMON GROVE	427 :	75 /	64 /	0.00 /
08/10/15	LMGC1:	LEMON GROVE	427 :	76 /	65 /	0.00 /
08/11/15	LMGC1:	LEMON GROVE	427 :	78 /	66 /	0.00 /
08/12/15	LMGC1:	LEMON GROVE	427 :	86 /	63 /	0.00 /
08/13/15	LMGC1:	LEMON GROVE	427 :	90 /	67 /	0.00 /
08/14/15	LMGC1:	LEMON GROVE	427 :	94 /	68 /	0.00 /
08/15/15	LMGC1:	LEMON GROVE	427 :	98 /	70 /	0.00 /
08/16/15	LMGC1:	LEMON GROVE	427 :	93 /	70 /	0.00 /
08/17/15	LMGC1:	LEMON GROVE	427 :	79 /	69 /	0.00 /
08/18/15	LMGC1:	LEMON GROVE	427 :	79 /	70 /	0.00 /
08/19/15	LMGC1:	LEMON GROVE	427 :	80 /	68 /	0.00 /
08/20/15	LMGC1:	LEMON GROVE	427 :	76 /	67 /	0.00 /
08/21/15	LMGC1:	LEMON GROVE	427 :	76 /	69 /	0.00 /
08/22/15	LMGC1:	LEMON GROVE	427 :	77 /	67 /	0.00 /
08/23/15	LMGC1:	LEMON GROVE	427 :	83 /	66 /	0.00 /
08/24/15	LMGC1:	LEMON GROVE	427 :	83 /	65 /	0.00 /
08/25/15	LMGC1:	LEMON GROVE	427 :	84 /	69 /	0.00 /

08/26/15	LMGC1:	LEMON GROVE	427 :	87 /	70 /	0.00 /	
08/27/15	LMGC1:	LEMON GROVE	427 :	93 /	70 /	0.00 /	
08/28/15	LMGC1:	LEMON GROVE	427 :	92 /	70 /	0.00 /	
08/29/15	LMGC1:	LEMON GROVE	427 :	93 /	71 /	0.00 /	
08/30/15	LMGC1:	LEMON GROVE	427 :	83 /	69 /	0.00 /	
08/31/15	LMGC1:	LEMON GROVE	427 :	75 /	67 /	0.00 /	
09/01/15	LMGC1:	LEMON GROVE	427 :	77 /	67 /	0.00 /	
09/02/15	LMGC1:	LEMON GROVE	427 :	76 /	67 /	0.00 /	
09/03/15	LMGC1:	LEMON GROVE	427 :	76 /	63 /	0.00 /	
09/04/15	LMGC1:	LEMON GROVE	427 :	75 /	66 /	0.00 /	
09/05/15	LMGC1:	LEMON GROVE	427 :	79 /	63 /	0.00 /	
09/06/15	LMGC1:	LEMON GROVE	427 :	87 /	64 /	0.00 /	
09/07/15	LMGC1:	LEMON GROVE	427 :	92 /	70 /	0.00 /	
09/08/15	LMGC1:	LEMON GROVE	427 :	95 /	72 /	0.00 /	
09/09/15	LMGC1:	LEMON GROVE	427 :	98 /	77 /	0.00 /	
09/10/15	LMGC1:	LEMON GROVE	427 :	94 /	76 /	0.00 /	
09/11/15	LMGC1:	LEMON GROVE	427 :	88 /	75 /	0.00 /	
09/12/15	LMGC1:	LEMON GROVE	427 :	92 /	74 /	0.00 /	
09/13/15	LMGC1:	LEMON GROVE	427 :	85 /	71 /	0.00 /	
09/14/15	LMGC1:	LEMON GROVE	427 :	81 /	69 /	0.00 /	
09/15/15	LMGC1:	LEMON GROVE	427 :	79 /	72 /	0.80 /	
09/16/15	LMGC1:	LEMON GROVE	427 :	76 /	65 /	M /	
09/17/15	LMGC1:	LEMON GROVE	427 :	79 /	63 /	0.00 /	
09/18/15	LMGC1:	LEMON GROVE	427 :	82 /	63 /	0.00 /	
09/19/15	LMGC1:	LEMON GROVE	427 :	83 /	65 /	0.00 /	
09/20/15	LMGC1:	LEMON GROVE	427 :	101 /	70 /	0.00 /	
09/21/15	LMGC1:	LEMON GROVE	427 :	78 /	71 /	0.00 /	
09/22/15	LMGC1:	LEMON GROVE	427 :	82 /	70 /	0.00 /	
09/23/15	LMGC1:	LEMON GROVE	427 :	86 /	65 /	0.00 /	
09/24/15	LMGC1:	LEMON GROVE	427 :	87 /	67 /	0.00 /	
09/25/15	LMGC1:	LEMON GROVE	427 :	92 /	68 /	0.00 /	
09/26/15	LMGC1:	LEMON GROVE	427 :	87 /	68 /	0.00 /	
09/27/15	LMGC1:	LEMON GROVE	427 :	86 /	69 /	0.00 /	
09/28/15	LMGC1:	LEMON GROVE	427 :	88 /	67 /	0.00 /	
09/29/15	LMGC1:	LEMON GROVE	427 :	86 /	64 /	0.00 /	
09/30/15	LMGC1:	LEMON GROVE	427 :	89 /	61 /	0.00 /	
10/01/15	LMGC1:	LEMON GROVE	427 :	82 /	66 /	0.00 /	
10/02/15	LMGC1:	LEMON GROVE	427 :	78 /	65 /	0.00 /	
10/03/15	LMGC1:	LEMON GROVE	427 :	75 /	62 /	0.00 /	
10/04/15	LMGC1:	LEMON GROVE	427 :	69 /	65 /	0.19 /	
10/05/15	LMGC1:	LEMON GROVE	427 :	68 /	61 /	0.34 /	
10/06/15	LMGC1:	LEMON GROVE	427 :	75 /	59 /	0.00 /	
10/07/15	LMGC1:	LEMON GROVE	427 :	79 /	61 /	0.00 /	
10/08/15	LMGC1:	LEMON GROVE	427 :	87 /	62 /	0.00 /	
10/09/15	LMGC1:	LEMON GROVE	427 :	102 /	66 /	0.00 /	
10/10/15	LMGC1:	LEMON GROVE	427 :	99 /	78 /	0.00 /	
10/11/15	LMGC1:	LEMON GROVE	427 :	97 /	71 /	0.00 /	
10/12/15	LMGC1:	LEMON GROVE	427 :	96 /	72 /	0.00 /	
10/13/15	LMGC1:	LEMON GROVE	427 :	86 /	73 /	0.00 /	
10/14/15	LMGC1:	LEMON GROVE	427 :	86 /	71 /	0.00 /	
10/15/15	LMGC1:	LEMON GROVE	427 :	80 /	72 /	0.00 /	
10/16/15	LMGC1:	LEMON GROVE	427 :	72 /	69 /	0.00 /	
10/17/15	LMGC1:	LEMON GROVE	427 :	77 /	69 /	0.01 /	
10/18/15	LMGC1:	LEMON GROVE	427 :	74 /	69 /	0.02 /	
10/19/15	LMGC1:	LEMON GROVE	427 :	71 /	62 /	0.00 /	
10/20/15	LMGC1:	LEMON GROVE	427 :	74 /	62 /	0.00 /	
10/21/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /	
10/22/15	LMGC1:	LEMON GROVE	427 :	M /	M /	M /	
10/23/15	LMGC1:	LEMON GROVE	427 :	82 /	62 /	0.00 /	
10/24/15	LMGC1:	LEMON GROVE	427 :	89 /	60 /	0.00 /	

10/25/15	LMGC1:	LEMON GROVE	427 :	79 /	65 /	0.00 /	
10/26/15	LMGC1:	LEMON GROVE	427 :	85 /	59 /	0.00 /	
10/27/15	LMGC1:	LEMON GROVE	427 :	86 /	59 /	0.00 /	
10/28/15	LMGC1:	LEMON GROVE	427 :	81 /	62 /	0.00 /	
10/29/15	LMGC1:	LEMON GROVE	427 :	77 /	65 /	0.00 /	
10/30/15	LMGC1:	LEMON GROVE	427 :	83 /	58 /	0.00 /	
10/31/15	LMGC1:	LEMON GROVE	427 :	87 /	60 /	0.00 /	
11/01/15	LMGC1:	LEMON GROVE	427 :	85 /	59 /	0.00 /	
11/02/15	LMGC1:	LEMON GROVE	427 :	73 /	54 /	0.00 /	
11/03/15	LMGC1:	LEMON GROVE	427 :	66 /	55 /	0.12 /	
11/04/15	LMGC1:	LEMON GROVE	427 :	66 /	52 /	1.12 /	
11/05/15	LMGC1:	LEMON GROVE	427 :	71 /	52 /	0.00 /	
11/06/15	LMGC1:	LEMON GROVE	427 :	74 /	51 /	0.00 /	
11/07/15	LMGC1:	LEMON GROVE	427 :	79 /	50 /	0.00 /	
11/08/15	LMGC1:	LEMON GROVE	427 :	75 /	52 /	0.00 /	
11/09/15	LMGC1:	LEMON GROVE	427 :	68 /	55 /	0.00 /	
11/10/15	LMGC1:	LEMON GROVE	427 :	64 /	53 /	0.14 /	
11/11/15	LMGC1:	LEMON GROVE	427 :	77 /	49 /	0.00 /	
11/12/15	LMGC1:	LEMON GROVE	427 :	74 /	47 /	0.00 /	
11/13/15	LMGC1:	LEMON GROVE	427 :	76 /	49 /	0.00 /	
11/14/15	LMGC1:	LEMON GROVE	427 :	78 /	50 /	0.00 /	
11/15/15	LMGC1:	LEMON GROVE	427 :	67 /	51 /	0.00 /	
11/16/15	LMGC1:	LEMON GROVE	427 :	61 /	56 /	0.05 /	
11/17/15	LMGC1:	LEMON GROVE	427 :	70 /	43 /	0.00 /	
11/18/15	LMGC1:	LEMON GROVE	427 :	77 /	48 /	0.00 /	
11/19/15	LMGC1:	LEMON GROVE	427 :	82 /	55 /	0.00 /	
11/20/15	LMGC1:	LEMON GROVE	427 :	79 /	52 /	0.00 /	
11/21/15	LMGC1:	LEMON GROVE	427 :	89 /	55 /	0.00 /	
11/22/15	LMGC1:	LEMON GROVE	427 :	87 /	60 /	0.00 /	
11/23/15	LMGC1:	LEMON GROVE	427 :	79 /	55 /	0.00 /	
11/24/15	LMGC1:	LEMON GROVE	427 :	69 /	50 /	0.00 /	
11/25/15	LMGC1:	LEMON GROVE	427 :	62 /	55 /	0.08 /	
11/26/15	LMGC1:	LEMON GROVE	427 :	63 /	50 /	0.00 /	
11/27/15	LMGC1:	LEMON GROVE	427 :	60 /	49 /	0.16 /	
11/28/15	LMGC1:	LEMON GROVE	427 :	64 /	49 /	0.00 /	
11/29/15	LMGC1:	LEMON GROVE	427 :	66 /	47 /	0.00 /	
11/30/15	LMGC1:	LEMON GROVE	427 :	67 /	48 /	0.00 /	
12/01/15	LMGC1:	LEMON GROVE	427 :	68 /	45 /	0.00 /	
12/02/15	LMGC1:	LEMON GROVE	427 :	82 /	47 /	0.00 /	
12/03/15	LMGC1:	LEMON GROVE	427 :	79 /	50 /	0.00 /	
12/04/15	LMGC1:	LEMON GROVE	427 :	68 /	47 /	0.00 /	
12/05/15	LMGC1:	LEMON GROVE	427 :	76 /	48 /	0.00 /	
12/06/15	LMGC1:	LEMON GROVE	427 :	80 /	52 /	0.00 /	
12/07/15	LMGC1:	LEMON GROVE	427 :	78 /	51 /	0.00 /	
12/08/15	LMGC1:	LEMON GROVE	427 :	80 /	52 /	0.00 /	
12/09/15	LMGC1:	LEMON GROVE	427 :	75 /	52 /	0.00 /	
12/10/15	LMGC1:	LEMON GROVE	427 :	67 /	47 /	0.00 /	
12/11/15	LMGC1:	LEMON GROVE	427 :	62 /	55 /	0.19 /	
12/12/15	LMGC1:	LEMON GROVE	427 :	63 /	43 /	0.16 /	
12/13/15	LMGC1:	LEMON GROVE	427 :	65 /	47 /	0.00 /	
12/14/15	LMGC1:	LEMON GROVE	427 :	58 /	50 /	0.16 /	
12/15/15	LMGC1:	LEMON GROVE	427 :	60 /	43 /	0.00 /	
12/16/15	LMGC1:	LEMON GROVE	427 :	61 /	37 /	0.00 /	
12/17/15	LMGC1:	LEMON GROVE	427 :	67 /	41 /	0.00 /	
12/18/15	LMGC1:	LEMON GROVE	427 :	72 /	44 /	0.00 /	
12/19/15	LMGC1:	LEMON GROVE	427 :	63 /	45 /	0.00 /	
12/20/15	LMGC1:	LEMON GROVE	427 :	60 /	48 /	0.11 /	
12/21/15	LMGC1:	LEMON GROVE	427 :	63 /	44 /	0.00 /	
12/22/15	LMGC1:	LEMON GROVE	427 :	60 /	53 /	0.27 /	
12/23/15	LMGC1:	LEMON GROVE	427 :	61 /	56 /	0.13 /	

12/24/15	LMGC1:	LEMON GROVE	427 :	63 /	51 /	0.00 /
12/25/15	LMGC1:	LEMON GROVE	427 :	57 /	47 /	0.03 /
12/26/15	LMGC1:	LEMON GROVE	427 :	62 /	40 /	0.00 /
12/27/15	LMGC1:	LEMON GROVE	427 :	60 /	36 /	0.00 /
12/28/15	LMGC1:	LEMON GROVE	427 :	58 /	42 /	0.00 /
12/29/15	LMGC1:	LEMON GROVE	427 :	58 /	41 /	0.13 /
12/30/15	LMGC1:	LEMON GROVE	427 :	63 /	40 /	0.00 /
12/31/15	LMGC1:	LEMON GROVE	427 :	66 /	41 /	0.00 /

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01/01/15	SDLAM:	LA MESA	500 :	58 /	36 /	0.00 /
01/02/15	SDLAM:	LA MESA	500 :	58 /	38 /	0.00 /
01/03/15	SDLAM:	LA MESA	500 :	62 /	41 /	0.00 /
01/04/15	SDLAM:	LA MESA	500 :	69 /	42 /	0.00 /
01/05/15	SDLAM:	LA MESA	500 :	81 /	49 /	0.00 /
01/06/15	SDLAM:	LA MESA	500 :	85 /	54 /	0.00 /
01/07/15	SDLAM:	LA MESA	500 :	78 /	53 /	0.00 /
01/08/15	SDLAM:	LA MESA	500 :	70 /	55 /	0.00 /
01/09/15	SDLAM:	LA MESA	500 :	66 /	56 /	0.00 /
01/10/15	SDLAM:	LA MESA	500 :	71 /	51 /	0.00 /
01/11/15	SDLAM:	LA MESA	500 :	60 /	54 /	0.25 /
01/12/15	SDLAM:	LA MESA	500 :	67 /	57 /	0.04 /
01/13/15	SDLAM:	LA MESA	500 :	67 /	53 /	0.00 /
01/14/15	SDLAM:	LA MESA	500 :	71 /	48 /	0.00 /
01/15/15	SDLAM:	LA MESA	500 :	73 /	49 /	0.00 /
01/16/15	SDLAM:	LA MESA	500 :	74 /	49 /	0.00 /
01/17/15	SDLAM:	LA MESA	500 :	75 /	52 /	0.00 /
01/18/15	SDLAM:	LA MESA	500 :	75 /	52 /	0.00 /
01/19/15	SDLAM:	LA MESA	500 :	72 /	51 /	0.00 /
01/20/15	SDLAM:	LA MESA	500 :	65 /	49 /	0.00 /
01/21/15	SDLAM:	LA MESA	500 :	72 /	54 /	0.00 /
01/22/15	SDLAM:	LA MESA	500 :	77 /	48 /	0.00 /
01/23/15	SDLAM:	LA MESA	500 :	72 /	48 /	0.00 /
01/24/15	SDLAM:	LA MESA	500 :	78 /	47 /	0.00 /
01/25/15	SDLAM:	LA MESA	500 :	77 /	53 /	0.00 /
01/26/15	SDLAM:	LA MESA	500 :	70 /	60 /	0.03 /
01/27/15	SDLAM:	LA MESA	500 :	74 /	54 /	0.00 /
01/28/15	SDLAM:	LA MESA	500 :	75 /	53 /	0.00 /
01/29/15	SDLAM:	LA MESA	500 :	71 /	59 /	0.00 /
01/30/15	SDLAM:	LA MESA	500 :	62 /	57 /	0.01 /
01/31/15	SDLAM:	LA MESA	500 :	67 /	53 /	0.00 /
02/01/15	SDLAM:	LA MESA	500 :	73 /	51 /	0.00 /
02/02/15	SDLAM:	LA MESA	500 :	76 /	52 /	0.00 /
02/03/15	SDLAM:	LA MESA	500 :	77 /	48 /	0.00 /
02/04/15	SDLAM:	LA MESA	500 :	74 /	48 /	0.00 /
02/05/15	SDLAM:	LA MESA	500 :	80 /	48 /	0.00 /
02/06/15	SDLAM:	LA MESA	500 :	80 /	50 /	0.00 /
02/07/15	SDLAM:	LA MESA	500 :	75 /	47 /	0.00 /
02/08/15	SDLAM:	LA MESA	500 :	74 /	55 /	0.00 /
02/09/15	SDLAM:	LA MESA	500 :	71 /	54 /	0.00 /
02/10/15	SDLAM:	LA MESA	500 :	73 /	50 /	0.00 /
02/11/15	SDLAM:	LA MESA	500 :	85 /	54 /	0.00 /
02/12/15	SDLAM:	LA MESA	500 :	84 /	58 /	0.00 /
02/13/15	SDLAM:	LA MESA	500 :	85 /	57 /	0.00 /
02/14/15	SDLAM:	LA MESA	500 :	84 /	61 /	0.00 /
02/15/15	SDLAM:	LA MESA	500 :	79 /	56 /	0.00 /
02/16/15	SDLAM:	LA MESA	500 :	69 /	50 /	0.00 /
02/17/15	SDLAM:	LA MESA	500 :	68 /	56 /	0.00 /
02/18/15	SDLAM:	LA MESA	500 :	72 /	52 /	0.00 /
02/19/15	SDLAM:	LA MESA	500 :	71 /	51 /	0.00 /
02/20/15	SDLAM:	LA MESA	500 :	70 /	57 /	0.00 /
02/21/15	SDLAM:	LA MESA	500 :	65 /	58 /	0.00 /
02/22/15	SDLAM:	LA MESA	500 :	63 /	56 /	0.00 /
02/23/15	SDLAM:	LA MESA	500 :	65 /	52 /	0.41 /
02/24/15	SDLAM:	LA MESA	500 :	67 /	46 /	0.00 /
02/25/15	SDLAM:	LA MESA	500 :	70 /	48 /	0.00 /
02/26/15	SDLAM:	LA MESA	500 :	68 /	48 /	0.00 /

02/27/15	SDLAM:	LA MESA	500 :	65 /	52 /	0.00 /
02/28/15	SDLAM:	LA MESA	500 :	63 /	54 /	0.04 /
03/01/15	SDLAM:	LA MESA	500 :	55 /	52 /	0.72 /
03/02/15	SDLAM:	LA MESA	500 :	60 /	50 /	0.33 /
03/03/15	SDLAM:	LA MESA	500 :	64 /	47 /	0.00 /
03/04/15	SDLAM:	LA MESA	500 :	68 /	46 /	0.00 /
03/05/15	SDLAM:	LA MESA	500 :	75 /	46 /	0.00 /
03/06/15	SDLAM:	LA MESA	500 :	82 /	49 /	0.00 /
03/07/15	SDLAM:	LA MESA	500 :	83 /	54 /	0.00 /
03/08/15	SDLAM:	LA MESA	500 :	74 /	53 /	0.00 /
03/09/15	SDLAM:	LA MESA	500 :	70 /	50 /	0.00 /
03/10/15	SDLAM:	LA MESA	500 :	79 /	51 /	0.00 /
03/11/15	SDLAM:	LA MESA	500 :	78 /	58 /	0.00 /
03/12/15	SDLAM:	LA MESA	500 :	79 /	56 /	0.00 /
03/13/15	SDLAM:	LA MESA	500 :	88 /	62 /	0.00 /
03/14/15	SDLAM:	LA MESA	500 :	91 /	87 /	0.00 /
03/15/15	SDLAM:	LA MESA	500 :	90 /	68 /	0.00 /
03/16/15	SDLAM:	LA MESA	500 :	88 /	65 /	0.00 /
03/17/15	SDLAM:	LA MESA	500 :	81 /	60 /	0.00 /
03/18/15	SDLAM:	LA MESA	500 :	68 /	61 /	0.00 /
03/19/15	SDLAM:	LA MESA	500 :	71 /	60 /	0.00 /
03/20/15	SDLAM:	LA MESA	500 :	76 /	57 /	0.00 /
03/21/15	SDLAM:	LA MESA	500 :	74 /	58 /	0.00 /
03/22/15	SDLAM:	LA MESA	500 :	70 /	55 /	0.00 /
03/23/15	SDLAM:	LA MESA	500 :	69 /	53 /	0.00 /
03/24/15	SDLAM:	LA MESA	500 :	72 /	52 /	0.00 /
03/25/15	SDLAM:	LA MESA	500 :	81 /	54 /	0.00 /
03/26/15	SDLAM:	LA MESA	500 :	88 /	60 /	0.00 /
03/27/15	SDLAM:	LA MESA	500 :	90 /	63 /	0.00 /
03/28/15	SDLAM:	LA MESA	500 :	81 /	54 /	0.00 /
03/29/15	SDLAM:	LA MESA	500 :	79 /	59 /	0.00 /
03/30/15	SDLAM:	LA MESA	500 :	77 /	56 /	0.00 /
03/31/15	SDLAM:	LA MESA	500 :	71 /	56 /	0.00 /
04/01/15	SDLAM:	LA MESA	500 :	72 /	58 /	0.00 /
04/02/15	SDLAM:	LA MESA	500 :	68 /	56 /	0.00 /
04/03/15	SDLAM:	LA MESA	500 :	86 /	53 /	0.00 /
04/04/15	SDLAM:	LA MESA	500 :	80 /	57 /	0.00 /
04/05/15	SDLAM:	LA MESA	500 :	66 /	58 /	0.00 /
04/06/15	SDLAM:	LA MESA	500 :	65 /	54 /	0.00 /
04/07/15	SDLAM:	LA MESA	500 :	66 /	53 /	0.00 /
04/08/15	SDLAM:	LA MESA	500 :	66 /	53 /	0.00 /
04/09/15	SDLAM:	LA MESA	500 :	70 /	50 /	0.00 /
04/10/15	SDLAM:	LA MESA	500 :	69 /	53 /	0.00 /
04/11/15	SDLAM:	LA MESA	500 :	71 /	51 /	0.00 /
04/12/15	SDLAM:	LA MESA	500 :	71 /	52 /	0.00 /
04/13/15	SDLAM:	LA MESA	500 :	75 /	57 /	0.00 /
04/14/15	SDLAM:	LA MESA	500 :	74 /	59 /	0.00 /
04/15/15	SDLAM:	LA MESA	500 :	79 /	53 /	0.00 /
04/16/15	SDLAM:	LA MESA	500 :	80 /	54 /	0.00 /
04/17/15	SDLAM:	LA MESA	500 :	80 /	55 /	0.00 /
04/18/15	SDLAM:	LA MESA	500 :	79 /	53 /	0.00 /
04/19/15	SDLAM:	LA MESA	500 :	74 /	54 /	0.00 /
04/20/15	SDLAM:	LA MESA	500 :	68 /	57 /	0.00 /
04/21/15	SDLAM:	LA MESA	500 :	68 /	58 /	0.00 /
04/22/15	SDLAM:	LA MESA	500 :	67 /	56 /	0.00 /
04/23/15	SDLAM:	LA MESA	500 :	68 /	56 /	0.00 /
04/24/15	SDLAM:	LA MESA	500 :	63 /	56 /	0.05 /
04/25/15	SDLAM:	LA MESA	500 :	65 /	56 /	0.01 /
04/26/15	SDLAM:	LA MESA	500 :	69 /	54 /	0.01 /
04/27/15	SDLAM:	LA MESA	500 :	82 /	55 /	0.00 /

04/28/15	SDLAM:	LA MESA	500 :	M	/	59	/ 0.00 /
04/29/15	SDLAM:	LA MESA	500 :	91	/	59	/ 0.00 /
04/30/15	SDLAM:	LA MESA	500 :	89	/	61	/ 0.00 /
05/01/15	SDLAM:	LA MESA	500 :	91	/	60	/ 0.00 /
05/02/15	SDLAM:	LA MESA	500 :	71	/	59	/ 0.00 /
05/03/15	SDLAM:	LA MESA	500 :	71	/	61	/ 0.00 /
05/04/15	SDLAM:	LA MESA	500 :	68	/	59	/ 0.00 /
05/05/15	SDLAM:	LA MESA	500 :	67	/	58	/ 0.00 /
05/06/15	SDLAM:	LA MESA	500 :	65	/	58	/ 0.00 /
05/07/15	SDLAM:	LA MESA	500 :	64	/	56	/ 0.00 /
05/08/15	SDLAM:	LA MESA	500 :	59	/	50	/ 0.56 /
05/09/15	SDLAM:	LA MESA	500 :	65	/	54	/ 0.02 /
05/10/15	SDLAM:	LA MESA	500 :	71	/	53	/ 0.00 /
05/11/15	SDLAM:	LA MESA	500 :	75	/	56	/ 0.00 /
05/12/15	SDLAM:	LA MESA	500 :	67	/	59	/ 0.00 /
05/13/15	SDLAM:	LA MESA	500 :	65	/	55	/ 0.00 /
05/14/15	SDLAM:	LA MESA	500 :	64	/	55	/ 0.11 /
05/15/15	SDLAM:	LA MESA	500 :	64	/	53	/ 0.74 /
05/16/15	SDLAM:	LA MESA	500 :	66	/	55	/ 0.00 /
05/17/15	SDLAM:	LA MESA	500 :	68	/	54	/ 0.00 /
05/18/15	SDLAM:	LA MESA	500 :	67	/	57	/ 0.00 /
05/19/15	SDLAM:	LA MESA	500 :	69	/	57	/ 0.00 /
05/20/15	SDLAM:	LA MESA	500 :	68	/	57	/ 0.00 /
05/21/15	SDLAM:	LA MESA	500 :	66	/	58	/ 0.00 /
05/22/15	SDLAM:	LA MESA	500 :	66	/	57	/ 0.02 /
05/23/15	SDLAM:	LA MESA	500 :	67	/	56	/ 0.03 /
05/24/15	SDLAM:	LA MESA	500 :	66	/	58	/ 0.00 /
05/25/15	SDLAM:	LA MESA	500 :	64	/	59	/ 0.00 /
05/26/15	SDLAM:	LA MESA	500 :	66	/	59	/ 0.00 /
05/27/15	SDLAM:	LA MESA	500 :	68	/	57	/ 0.00 /
05/28/15	SDLAM:	LA MESA	500 :	74	/	58	/ 0.00 /
05/29/15	SDLAM:	LA MESA	500 :	75	/	58	/ 0.00 /
05/30/15	SDLAM:	LA MESA	500 :	75	/	58	/ 0.00 /
05/31/15	SDLAM:	LA MESA	500 :	72	/	59	/ 0.00 /
06/01/15	SDLAM:	LA MESA	500 :	75	/	60	/ 0.00 /
06/02/15	SDLAM:	LA MESA	500 :	75	/	57	/ 0.00 /
06/03/15	SDLAM:	LA MESA	500 :	71	/	59	/ 0.00 /
06/04/15	SDLAM:	LA MESA	500 :	67	/	60	/ 0.00 /
06/05/15	SDLAM:	LA MESA	500 :	69	/	57	/ 0.00 /
06/06/15	SDLAM:	LA MESA	500 :	74	/	59	/ 0.00 /
06/07/15	SDLAM:	LA MESA	500 :	77	/	60	/ 0.00 /
06/08/15	SDLAM:	LA MESA	500 :	86	/	59	/ 0.00 /
06/09/15	SDLAM:	LA MESA	500 :	85	/	69	/ 0.00 /
06/10/15	SDLAM:	LA MESA	500 :	72	/	63	/ 0.00 /
06/11/15	SDLAM:	LA MESA	500 :	72	/	62	/ 0.00 /
06/12/15	SDLAM:	LA MESA	500 :	68	/	62	/ 0.00 /
06/13/15	SDLAM:	LA MESA	500 :	70	/	59	/ 0.00 /
06/14/15	SDLAM:	LA MESA	500 :	M	/	M	/ M /
06/15/15	SDLAM:	LA MESA	500 :	M	/	M	/ M /
06/16/15	SDLAM:	LA MESA	500 :	M	/	M	/ M /
06/17/15	SDLAM:	LA MESA	500 :	M	/	M	/ M /
06/18/15	SDLAM:	LA MESA	500 :	M	/	M	/ M /
06/19/15	SDLAM:	LA MESA	500 :	M	/	M	/ M /
06/20/15	SDLAM:	LA MESA	500 :	M	/	M	/ M /
06/21/15	SDLAM:	LA MESA	500 :	M	/	M	/ M /
06/22/15	SDLAM:	LA MESA	500 :	83	/	63	/ 0.00 /
06/23/15	SDLAM:	LA MESA	500 :	84	/	60	/ 0.00 /
06/24/15	SDLAM:	LA MESA	500 :	79	/	61	/ 0.00 /
06/25/15	SDLAM:	LA MESA	500 :	82	/	63	/ 0.00 /
06/26/15	SDLAM:	LA MESA	500 :	85	/	62	/ 0.00 /

06/27/15	SDLAM:	LA MESA	500 :	77	/	62	/	0.00 /
06/28/15	SDLAM:	LA MESA	500 :	85	/	67	/	0.00 /
06/29/15	SDLAM:	LA MESA	500 :	84	/	66	/	0.00 /
06/30/15	SDLAM:	LA MESA	500 :	88	/	63	/	0.04 /
07/01/15	SDLAM:	LA MESA	500 :	85	/	68	/	0.00 /
07/02/15	SDLAM:	LA MESA	500 :	85	/	67	/	0.02 /
07/03/15	SDLAM:	LA MESA	500 :	84	/	63	/	0.00 /
07/04/15	SDLAM:	LA MESA	500 :	75	/	65	/	0.00 /
07/05/15	SDLAM:	LA MESA	500 :	74	/	63	/	0.00 /
07/06/15	SDLAM:	LA MESA	500 :	73	/	62	/	0.00 /
07/07/15	SDLAM:	LA MESA	500 :	77	/	63	/	0.00 /
07/08/15	SDLAM:	LA MESA	500 :	75	/	63	/	0.00 /
07/09/15	SDLAM:	LA MESA	500 :	75	/	63	/	0.00 /
07/10/15	SDLAM:	LA MESA	500 :	76	/	61	/	0.01 /
07/11/15	SDLAM:	LA MESA	500 :	77	/	59	/	0.00 /
07/12/15	SDLAM:	LA MESA	500 :	81	/	60	/	0.00 /
07/13/15	SDLAM:	LA MESA	500 :	83	/	61	/	0.00 /
07/14/15	SDLAM:	LA MESA	500 :	77	/	64	/	0.00 /
07/15/15	SDLAM:	LA MESA	500 :	78	/	61	/	0.00 /
07/16/15	SDLAM:	LA MESA	500 :	80	/	63	/	0.00 /
07/17/15	SDLAM:	LA MESA	500 :	85	/	62	/	0.00 /
07/18/15	SDLAM:	LA MESA	500 :	76	/	64	/	0.44 /
07/19/15	SDLAM:	LA MESA	500 :	89	/	71	/	0.88 /
07/20/15	SDLAM:	LA MESA	500 :	81	/	70	/	0.08 /
07/21/15	SDLAM:	LA MESA	500 :	80	/	67	/	0.00 /
07/22/15	SDLAM:	LA MESA	500 :	81	/	69	/	0.00 /
07/23/15	SDLAM:	LA MESA	500 :	83	/	69	/	0.00 /
07/24/15	SDLAM:	LA MESA	500 :	87	/	67	/	0.00 /
07/25/15	SDLAM:	LA MESA	500 :	90	/	65	/	0.00 /
07/26/15	SDLAM:	LA MESA	500 :	84	/	64	/	0.00 /
07/27/15	SDLAM:	LA MESA	500 :	78	/	64	/	0.00 /
07/28/15	SDLAM:	LA MESA	500 :	81	/	61	/	0.00 /
07/29/15	SDLAM:	LA MESA	500 :	82	/	64	/	0.00 /
07/30/15	SDLAM:	LA MESA	500 :	85	/	67	/	0.00 /
07/31/15	SDLAM:	LA MESA	500 :	88	/	68	/	0.00 /
08/01/15	SDLAM:	LA MESA	500 :	80	/	66	/	0.00 /
08/02/15	SDLAM:	LA MESA	500 :	83	/	65	/	0.00 /
08/03/15	SDLAM:	LA MESA	500 :	84	/	66	/	0.00 /
08/04/15	SDLAM:	LA MESA	500 :	89	/	63	/	0.00 /
08/05/15	SDLAM:	LA MESA	500 :	92	/	65	/	0.00 /
08/06/15	SDLAM:	LA MESA	500 :	85	/	66	/	0.00 /
08/07/15	SDLAM:	LA MESA	500 :	80	/	66	/	0.00 /
08/08/15	SDLAM:	LA MESA	500 :	78	/	65	/	0.00 /
08/09/15	SDLAM:	LA MESA	500 :	77	/	63	/	0.00 /
08/10/15	SDLAM:	LA MESA	500 :	78	/	63	/	0.00 /
08/11/15	SDLAM:	LA MESA	500 :	79	/	64	/	0.00 /
08/12/15	SDLAM:	LA MESA	500 :	87	/	62	/	0.00 /
08/13/15	SDLAM:	LA MESA	500 :	92	/	66	/	0.00 /
08/14/15	SDLAM:	LA MESA	500 :	95	/	68	/	0.00 /
08/15/15	SDLAM:	LA MESA	500 :	97	/	69	/	0.00 /
08/16/15	SDLAM:	LA MESA	500 :	96	/	69	/	0.00 /
08/17/15	SDLAM:	LA MESA	500 :	81	/	68	/	0.00 /
08/18/15	SDLAM:	LA MESA	500 :	82	/	69	/	0.00 /
08/19/15	SDLAM:	LA MESA	500 :	81	/	66	/	0.00 /
08/20/15	SDLAM:	LA MESA	500 :	79	/	65	/	0.00 /
08/21/15	SDLAM:	LA MESA	500 :	79	/	67	/	0.00 /
08/22/15	SDLAM:	LA MESA	500 :	81	/	65	/	0.00 /
08/23/15	SDLAM:	LA MESA	500 :	84	/	64	/	0.00 /
08/24/15	SDLAM:	LA MESA	500 :	85	/	64	/	0.00 /
08/25/15	SDLAM:	LA MESA	500 :	83	/	68	/	0.09 /

08/26/15	SDLAM:	LA MESA	500 :	92 /	68 /	0.00 /
08/27/15	SDLAM:	LA MESA	500 :	94 /	70 /	0.00 /
08/28/15	SDLAM:	LA MESA	500 :	96 /	72 /	0.00 /
08/29/15	SDLAM:	LA MESA	500 :	94 /	70 /	0.00 /
08/30/15	SDLAM:	LA MESA	500 :	86 /	68 /	0.00 /
08/31/15	SDLAM:	LA MESA	500 :	78 /	65 /	0.00 /
09/01/15	SDLAM:	LA MESA	500 :	79 /	66 /	0.00 /
09/02/15	SDLAM:	LA MESA	500 :	78 /	66 /	0.00 /
09/03/15	SDLAM:	LA MESA	500 :	78 /	61 /	0.00 /
09/04/15	SDLAM:	LA MESA	500 :	77 /	64 /	0.00 /
09/05/15	SDLAM:	LA MESA	500 :	80 /	62 /	0.00 /
09/06/15	SDLAM:	LA MESA	500 :	89 /	63 /	0.00 /
09/07/15	SDLAM:	LA MESA	500 :	94 /	70 /	0.00 /
09/08/15	SDLAM:	LA MESA	500 :	96 /	73 /	0.00 /
09/09/15	SDLAM:	LA MESA	500 :	99 /	78 /	0.00 /
09/10/15	SDLAM:	LA MESA	500 :	95 /	75 /	0.00 /
09/11/15	SDLAM:	LA MESA	500 :	90 /	75 /	0.00 /
09/12/15	SDLAM:	LA MESA	500 :	93 /	72 /	0.00 /
09/13/15	SDLAM:	LA MESA	500 :	87 /	70 /	0.00 /
09/14/15	SDLAM:	LA MESA	500 :	84 /	67 /	0.00 /
09/15/15	SDLAM:	LA MESA	500 :	78 /	70 /	1.05 /
09/16/15	SDLAM:	LA MESA	500 :	77 /	64 /	0.09 /
09/17/15	SDLAM:	LA MESA	500 :	80 /	63 /	0.00 /
09/18/15	SDLAM:	LA MESA	500 :	84 /	63 /	0.00 /
09/19/15	SDLAM:	LA MESA	500 :	85 /	65 /	0.00 /
09/20/15	SDLAM:	LA MESA	500 :	100 /	70 /	0.00 /
09/21/15	SDLAM:	LA MESA	500 :	77 /	70 /	0.00 /
09/22/15	SDLAM:	LA MESA	500 :	84 /	68 /	0.00 /
09/23/15	SDLAM:	LA MESA	500 :	86 /	64 /	0.00 /
09/24/15	SDLAM:	LA MESA	500 :	89 /	67 /	0.00 /
09/25/15	SDLAM:	LA MESA	500 :	92 /	68 /	0.00 /
09/26/15	SDLAM:	LA MESA	500 :	90 /	68 /	0.00 /
09/27/15	SDLAM:	LA MESA	500 :	89 /	67 /	0.00 /
09/28/15	SDLAM:	LA MESA	500 :	89 /	65 /	0.00 /
09/29/15	SDLAM:	LA MESA	500 :	86 /	63 /	0.00 /
09/30/15	SDLAM:	LA MESA	500 :	89 /	62 /	0.00 /
10/01/15	SDLAM:	LA MESA	500 :	83 /	64 /	0.00 /
10/02/15	SDLAM:	LA MESA	500 :	80 /	63 /	0.00 /
10/03/15	SDLAM:	LA MESA	500 :	77 /	62 /	0.00 /
10/04/15	SDLAM:	LA MESA	500 :	68 /	63 /	0.21 /
10/05/15	SDLAM:	LA MESA	500 :	66 /	60 /	0.40 /
10/06/15	SDLAM:	LA MESA	500 :	74 /	58 /	0.00 /
10/07/15	SDLAM:	LA MESA	500 :	79 /	60 /	0.00 /
10/08/15	SDLAM:	LA MESA	500 :	87 /	63 /	0.00 /
10/09/15	SDLAM:	LA MESA	500 :	100 /	68 /	0.00 /
10/10/15	SDLAM:	LA MESA	500 :	98 /	75 /	0.00 /
10/11/15	SDLAM:	LA MESA	500 :	97 /	74 /	0.00 /
10/12/15	SDLAM:	LA MESA	500 :	97 /	73 /	0.00 /
10/13/15	SDLAM:	LA MESA	500 :	87 /	73 /	0.00 /
10/14/15	SDLAM:	LA MESA	500 :	88 /	70 /	0.00 /
10/15/15	SDLAM:	LA MESA	500 :	79 /	70 /	0.00 /
10/16/15	SDLAM:	LA MESA	500 :	72 /	68 /	0.00 /
10/17/15	SDLAM:	LA MESA	500 :	77 /	67 /	0.01 /
10/18/15	SDLAM:	LA MESA	500 :	75 /	67 /	0.03 /
10/19/15	SDLAM:	LA MESA	500 :	73 /	61 /	0.00 /
10/20/15	SDLAM:	LA MESA	500 :	74 /	60 /	0.00 /
10/21/15	SDLAM:	LA MESA	500 :	78 /	59 /	0.00 /
10/22/15	SDLAM:	LA MESA	500 :	78 /	61 /	0.00 /
10/23/15	SDLAM:	LA MESA	500 :	82 /	60 /	0.00 /
10/24/15	SDLAM:	LA MESA	500 :	88 /	63 /	0.00 /

10/25/15	SDLAM:	LA MESA	500 :	80 /	67 /	0.00 /
10/26/15	SDLAM:	LA MESA	500 :	86 /	60 /	0.00 /
10/27/15	SDLAM:	LA MESA	500 :	85 /	62 /	0.00 /
10/28/15	SDLAM:	LA MESA	500 :	82 /	63 /	0.00 /
10/29/15	SDLAM:	LA MESA	500 :	77 /	64 /	0.00 /
10/30/15	SDLAM:	LA MESA	500 :	82 /	57 /	0.00 /
10/31/15	SDLAM:	LA MESA	500 :	87 /	60 /	0.00 /
11/01/15	SDLAM:	LA MESA	500 :	86 /	63 /	0.00 /
11/02/15	SDLAM:	LA MESA	500 :	74 /	58 /	0.00 /
11/03/15	SDLAM:	LA MESA	500 :	66 /	56 /	0.07 /
11/04/15	SDLAM:	LA MESA	500 :	65 /	50 /	0.79 /
11/05/15	SDLAM:	LA MESA	500 :	70 /	50 /	0.00 /
11/06/15	SDLAM:	LA MESA	500 :	73 /	51 /	0.00 /
11/07/15	SDLAM:	LA MESA	500 :	78 /	52 /	0.00 /
11/08/15	SDLAM:	LA MESA	500 :	75 /	53 /	0.00 /
11/09/15	SDLAM:	LA MESA	500 :	68 /	52 /	0.00 /
11/10/15	SDLAM:	LA MESA	500 :	63 /	53 /	0.07 /
11/11/15	SDLAM:	LA MESA	500 :	76 /	47 /	0.00 /
11/12/15	SDLAM:	LA MESA	500 :	73 /	48 /	0.00 /
11/13/15	SDLAM:	LA MESA	500 :	75 /	49 /	0.00 /
11/14/15	SDLAM:	LA MESA	500 :	77 /	53 /	0.00 /
11/15/15	SDLAM:	LA MESA	500 :	68 /	56 /	0.00 /
11/16/15	SDLAM:	LA MESA	500 :	59 /	54 /	0.04 /
11/17/15	SDLAM:	LA MESA	500 :	69 /	44 /	0.00 /
11/18/15	SDLAM:	LA MESA	500 :	76 /	57 /	0.00 /
11/19/15	SDLAM:	LA MESA	500 :	81 /	56 /	0.00 /
11/20/15	SDLAM:	LA MESA	500 :	80 /	56 /	0.00 /
11/21/15	SDLAM:	LA MESA	500 :	87 /	59 /	0.00 /
11/22/15	SDLAM:	LA MESA	500 :	86 /	63 /	0.00 /
11/23/15	SDLAM:	LA MESA	500 :	79 /	58 /	0.00 /
11/24/15	SDLAM:	LA MESA	500 :	70 /	53 /	0.00 /
11/25/15	SDLAM:	LA MESA	500 :	61 /	53 /	0.12 /
11/26/15	SDLAM:	LA MESA	500 :	61 /	51 /	0.00 /
11/27/15	SDLAM:	LA MESA	500 :	61 /	48 /	0.15 /
11/28/15	SDLAM:	LA MESA	500 :	63 /	45 /	0.00 /
11/29/15	SDLAM:	LA MESA	500 :	65 /	45 /	0.00 /
11/30/15	SDLAM:	LA MESA	500 :	65 /	44 /	0.00 /
12/01/15	SDLAM:	LA MESA	500 :	67 /	45 /	0.00 /
12/02/15	SDLAM:	LA MESA	500 :	80 /	50 /	0.00 /
12/03/15	SDLAM:	LA MESA	500 :	78 /	55 /	0.00 /
12/04/15	SDLAM:	LA MESA	500 :	67 /	48 /	0.00 /
12/05/15	SDLAM:	LA MESA	500 :	74 /	50 /	0.00 /
12/06/15	SDLAM:	LA MESA	500 :	80 /	55 /	0.00 /
12/07/15	SDLAM:	LA MESA	500 :	77 /	55 /	0.00 /
12/08/15	SDLAM:	LA MESA	500 :	80 /	56 /	0.00 /
12/09/15	SDLAM:	LA MESA	500 :	76 /	58 /	0.00 /
12/10/15	SDLAM:	LA MESA	500 :	67 /	50 /	0.00 /
12/11/15	SDLAM:	LA MESA	500 :	62 /	52 /	0.43 /
12/12/15	SDLAM:	LA MESA	500 :	63 /	43 /	0.01 /
12/13/15	SDLAM:	LA MESA	500 :	65 /	45 /	0.00 /
12/14/15	SDLAM:	LA MESA	500 :	56 /	48 /	0.19 /
12/15/15	SDLAM:	LA MESA	500 :	59 /	40 /	0.00 /
12/16/15	SDLAM:	LA MESA	500 :	60 /	42 /	0.00 /
12/17/15	SDLAM:	LA MESA	500 :	65 /	42 /	0.00 /
12/18/15	SDLAM:	LA MESA	500 :	71 /	47 /	0.00 /
12/19/15	SDLAM:	LA MESA	500 :	63 /	46 /	0.00 /
12/20/15	SDLAM:	LA MESA	500 :	61 /	50 /	0.11 /
12/21/15	SDLAM:	LA MESA	500 :	62 /	44 /	0.00 /
12/22/15	SDLAM:	LA MESA	500 :	59 /	52 /	0.33 /
12/23/15	SDLAM:	LA MESA	500 :	60 /	54 /	0.20 /

12/24/15	SDLAM:	LA MESA	500 :	63 /	51 /	0.00 /
12/25/15	SDLAM:	LA MESA	500 :	55 /	48 /	0.04 /
12/26/15	SDLAM:	LA MESA	500 :	60 /	38 /	0.00 /
12/27/15	SDLAM:	LA MESA	500 :	59 /	40 /	0.00 /
12/28/15	SDLAM:	LA MESA	500 :	58 /	40 /	0.00 /
12/29/15	SDLAM:	LA MESA	500 :	58 /	40 /	0.10 /
12/30/15	SDLAM:	LA MESA	500 :	62 /	42 /	0.00 /
12/31/15	SDLAM:	LA MESA	500 :	64 /	42 /	0.00 /

- Identifies circumstances in which the State Water Board will take action, even though the Regional Water Boards have primary jurisdiction;

- Addresses the eligibility requirements for small communities to qualify for carrying out compliance projects, in lieu of paying mandatory minimum penalties pursuant to California Water Code section 13385;

- Emphasizes the recording of enforcement data and the communication of enforcement information to the public and the regulated community; and

- Establishes annual enforcement reporting and planning requirements for the Water Boards.

The State's water quality requirements are not solely the purview of the Water Boards and their staffs. Other agencies, such as, the California Department of Fish and Game have the ability to enforce certain water quality provisions in state law. State law also allows members of the public to bring enforcement matters to the attention of the Water Boards and authorizes aggrieved persons to petition the State Water Board to review most actions or failures to act of the Regional Water Boards. In addition, state and federal statutes provide for public participation in the issuance of orders, policies, and water quality control plans. Finally, the federal Clean Water Act (CWA) authorizes citizens to bring suit against dischargers for certain types of CWA violations.

I.
FAIR, FIRM, AND CONSISTENT ENFORCEMENT

It is the policy of the State Water Board that the Water Boards shall strive to be fair, firm, and consistent in taking enforcement actions throughout the State, while recognizing the unique facts of each case.

A. Standard and Enforceable Orders

The Water Board orders shall be consistent except as appropriate for the specific circumstances related to the discharge and to accommodate differences in applicable water quality control plans.

B. Determining Compliance

The Water Boards shall implement a consistent and valid approach to determine compliance with enforceable orders.

C. Suitable Enforcement

The Water Boards' enforcement actions shall be suitable for each type of violation, providing consistent treatment for violations that are similar in nature and have similar water quality impacts. Where necessary, enforcement actions shall also ensure a timely return to compliance.

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STEP 4 – Adjustment Factors

Violator's Conduct Factors

There are three additional factors that should be considered for modification of the amount of the initial liability: the violator's culpability, the violator's efforts to cleanup or cooperate with regulatory authorities after the violation, and the violator's compliance history. Not all factors will apply in every liability assessment.

TABLE 4 – Violator's Conduct Factors

Factor	Adjustment
Culpability	Discharger's degree of culpability regarding the violation. Higher liabilities should result from intentional or negligent violations than for accidental, non-negligent violations. A first step is to identify any performance standards (or, in their absence, prevailing industry practices) in the context of the violation. The test is what a reasonable and prudent person would have done or not done under similar circumstances. Adjustment should result in a multiplier between **0.5 to 1.5**, with the lower multiplier for accidental incidents, and higher multiplier for intentional or negligent behavior.
Cleanup and Cooperation	Extent to which the discharger voluntarily cooperated in returning to compliance and correcting environmental damage, including any voluntary cleanup efforts undertaken. Adjustment should result in a multiplier between **0.75 to 1.5,** with the lower multiplier where there is a high degree of cleanup and cooperation, and higher multiplier where this is absent.
History of Violations	Prior history of violations. Where there is a history of repeat violations, a minimum multiplier of **1.1** should be used to reflect this.

After each of the above factors is considered for the violations involved, the applicable factor should be multiplied by the proposed amount for each violation to determine the revised amount for that violation.

Multiple Violations Resulting From the Same Incident

By statute, certain situations that involve multiple violations are treated as a single violation per day, such as a single operational upset that leads to simultaneous violations of more than one pollutant parameter. (Water Code § 13385, sub. (f)(1).) For situations not addressed by statute, a single base liability amount can also be assessed for multiple violations at the discretion of the Water Boards, under the following circumstances:

a. The facility has violated the same requirement at one or more locations within the facility;

b. A single operational upset where violations occur on multiple days;

c. The violation continues for more than one day;

d. When violations are not independent of one another or are not substantially distinguishable. For such violations, the Water Boards may consider the extent of the violation in terms of the most egregious violation;

e. A single act may violate multiple requirements, and therefore constitute multiple violations. For example, a construction dewatering discharge to a dewatering basin located on a gravel bar next to stream may violate a requirement that mandates the use of best management practices (BMPs) for sediment and turbidity control, a requirement prohibiting the discharge of soil silt or other organic matter to waters of the State, and a requirement that temporary sedimentation basins be located at least 100 feet from a stream channel. Such an act would constitute three distinct violations that may be addressed with a single base liability amount.

If the violations do not fit the above categories, each instance of the same violation shall be calculated as a separate violation.

Except where statutorily required, multiple violations shall not be grouped and considered as a single base liability amount when those multiple violations each result in a distinguishable economic benefit to the violator.

Multiple Day Violations

For violations that are assessed a civil liability on a per day basis, the initial liability amount should be assessed for each day up to thirty (30) days. For violations that last more than thirty (30) days, the daily assessment can be less than the calculated daily assessment, provided that it is no less than the per day economic benefit, if any, resulting from the violation. For these cases, the Water Board must make express findings that the violation:

a. Is not causing daily detrimental impacts to the environment or the regulatory program;

b. Results in no economic benefit from the illegal conduct that can be measured on a daily basis; or,

c. Occurred without the knowledge or control of the violator, who therefore did not take action to mitigate or eliminate the violation.

If one of the above findings is made, an alternate approach to penalty calculation for multiple day violations may be used. In these cases, the liability shall not be less than an amount that is calculated based on an assessment of the initial Total Base Liability Amount for the first day of the violation, plus an assessment for each five day period of violation until the 30th day, plus an assessment for each thirty (30) days of violation. For example, a violation lasting sixty-two (62) days would accrue a total of 8 day's worth of violations, based on a per day assessment for day 1, 5, 10, 15, 20, 25, 30, and 60. Similarly, a violation lasting ninety-nine (99) days would accrue a total of 9 day's worth of violations, based on a per day assessment for day 1, 5, 10, 15, 20, 25, 30, 60, and 90.

STEP 5 – Determination of Total Base Liability Amount

The Total Base Liability Amount will be determined by adding the amounts above for each violation, though this may be adjusted for multiple day violations as noted above. Depending on the statute controlling the liability assessment for a violation, the liability can be assessed as either a per day penalty, a per gallon penalty, or both.

APPENDIX 5:
Glossary

Active Areas of Construction
All areas subject to land surface disturbance activities related to the project including, but not limited to, project staging areas, immediate access areas and storage areas. All previously active areas are still considered active areas until final stabilization is complete. [The construction activity Phases used in this General Permit are the Preliminary Phase, Grading and Land Development Phase, Streets and Utilities Phase, and the Vertical Construction Phase.]

Active Treatment System (ATS)
A treatment system that employs chemical coagulation, chemical flocculation, or electrocoagulation to aid in the reduction of turbidity caused by fine suspended sediment.

Acute Toxicity Test
A chemical stimulus severe enough to rapidly induce a negative effect; in aquatic toxicity tests, an effect observed within 96 hours or less is considered acute.

Air Deposition
Airborne particulates from construction activities. .

Approved Signatory
A person who has legal authority to sign, certify, and electronically submit Permit Registration Documents and Notices of Termination on behalf of the Legally Responsible Person.

Beneficial Uses
As defined in the California Water Code, beneficial uses of the waters of the state that may be protected against quality degradation include, but are not limited to, domestic, municipal, agricultural and industrial supply; power generation; recreation; aesthetic enjoyment; navigation; and preservation and enhancement of fish, wildlife, and other aquatic resources or preserves.

Best Available Technology Economically Achievable (BAT)
As defined by USEPA, BAT is a technology-based standard established by the Clean Water Act (CWA) as the most appropriate means available on a national basis for controlling the direct discharge of toxic and nonconventional pollutants to navigable waters. The BAT effluent limitations guidelines, in general, represent the best existing performance of treatment technologies that are economically achievable within an industrial point source category or subcategory.

Best Conventional Pollutant Control Technology (BCT)

As defined by USEPA, BCT is a technology-based standard for the discharge from existing industrial point sources of conventional pollutants including biochemical oxygen demand (BOD), total suspended sediment (TSS), fecal coliform, pH, oil and grease.

Best Professional Judgment (BPJ)
The method used by permit writers to develop technology-based NPDES permit conditions on a case-by-case basis using all reasonably available and relevant data.

Best Management Practices (BMPs)
BMPs are scheduling of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the discharge of pollutants. BMPs also include treatment requirements, operating procedures, and practices to control site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

Chain of Custody (COC)
Form used to track sample handling as samples progress from sample collection to the analytical laboratory. The COC is then used to track the resulting analytical data from the laboratory to the client. COC forms can be obtained from an analytical laboratory upon request.

Coagulation
The clumping of particles in a discharge to settle out impurities, often induced by chemicals such as lime, alum, and iron salts.

Common Plan of Development
Generally a contiguous area where multiple, distinct construction activities may be taking place at different times under one plan. A plan is generally defined as any piece of documentation or physical demarcation that indicates that construction activities may occur on a common plot. Such documentation could consist of a tract map, parcel map, demolition plans, grading plans or contract documents. Any of these documents could delineate the boundaries of a common plan area. However, broad planning documents, such as land use master plans, conceptual master plans, or broad-based CEQA or NEPA documents that identify potential projects for an agency or facility are not considered common plans of development.

Daily Average Discharge
The discharge of a pollutant measured during any 24-hour period that reasonably represents a calendar day for purposes of sampling. For pollutants with limitations expressed in units of mass, the daily discharge is calculated as the total mass of the pollutant discharged during the day. For pollutants with limitations expressed in other units of measurement (e.g., concentration) the daily discharge is calculated as the average measurement of the pollutant

materials when stored outside and potentially exposed to rain, and other housekeeping measures. If necessary, pH-impaired storm water from construction sites can be treated in a filter or settling pond or basin, with additional natural or chemical treatment required to meet pH limits set forth in this permit. The basin or pond acts as a collection point and holds storm water for a sufficient period for the contaminants to be settled out, either naturally or artificially, and allows any additional treatment to take place. The State Water Board considers these techniques to be equivalent to BCT. In determining the pH concentration limit for discharges, the State Water Board used BPJ to set these limitations.

The chosen limits were established by calculating three standard deviations above and below the mean pH of runoff from highway construction sites[7] in California. Proper implementation of BMPs should result in discharges that are within the range of 6.0 to 9.0 pH Units.

ii. ***Turbidity NEL***

The Turbidity NEL of 500 NTU is a technology-based numeric effluent limitation and was developed using three different analyses aimed at finding the appropriate threshold to set the technology-based limit to ensure environmental protection, effluent quality and cost-effectiveness. The analyses fell into three, main types: (1) an ecoregion-specific dataset developed by Simon et. al. (2004) [8]; (2) Statewide Regional Water Quality Control Board enforcement data; and (3) published, peer-reviewed studies and reports on in-situ performance of best management practices in terms of erosion and sediment control on active construction sites.

A 1:3 relationship between turbidity (expressed as NTU) and suspended sediment concentration (expressed as mg/L) is assumed based on a review of suspended sediment and turbidity data from three gages used in the USGS National Water Quality Assessment Program:

USGS 11074000 SANTA ANA R BL PRADO DAM CA
USGS 11447650 SACRAMENTO R A FREEPORT CA
USGS 11303500 SAN JOAQUIN R NR VERNALIS CA

The turbidity NEL represents a feasible and cost effective performance standard that is demonstrated to be achievable. Although data has been collected to demonstrate that lower effluent levels may be achievable at some sites, staff cannot conclude at this time that a lower NEL is achievable within all the ecoregions of the state. The NEL represents staff determination that the NEL is the most practicable based on available data. The turbidity NEL represents a bridge between the narrative effluent limitations and receiving water limitations. The NEL limit may be considered an interim performance standard as additional data becomes available for evaluation during the next permit cycle. To support this NEL, State Water Board staff analyzed construction site discharge information (monitoring data, estimates) and receiving water monitoring information.

Since the turbidity NEL represents an appropriate threshold level expected at a site, compliance with this value does not necessarily represent compliance with either the narrative effluent limitations (as enforced through the BAT/BCT standard) or the receiving water limitations. In the San Diego region, some inland surface waters have a receiving water objective for turbidity equal to 20 NTU. Obviously a discharge up to, but not exceeding, the turbidity NEL of 500 NTU may still cause or contribute to the exceedance of the 20 NTU standard. Most of the waters of the State are protected by turbidity objectives based on background conditions.

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[7] Caltrans Construction Sites Runoff Characterization Study, 2002. Available at: http://www.dot.ca.gov/hq/env/stormwater/pdf/CTSW-RT-02-055.pdf.

[8] Simon, A., W.D. Dickerson, and A. Heins. 2004. Suspended-sediment transport rates at the 1.5-year recurrence interval for ecoregions of the United States: transport conditions at the bankfull and effective discharge. Geomorphology 58: pp. 243-262.

2. For Risk Level 2 and 3 dischargers, the NAL storm event daily average for turbidity is 250 NTU. The discharger shall take actions as described below if the discharge is outside of this range of turbidity values.

3. Whenever the results from a storm event daily average indicate that the discharge is below the lower NAL for pH, exceeds the upper NAL for pH, or exceeds the turbidity NAL (as listed in Table 1), the discharger shall conduct a construction site and run-on evaluation to determine whether pollutant source(s) associated with the site's construction activity may have caused or contributed to the NAL exceedance and shall immediately implement corrective actions if they are needed.

4. The site evaluation shall be documented in the SWPPP and specifically address whether the source(s) of the pollutants causing the exceedance of the NAL:

    a. Are related to the construction activities and whether additional BMPs are required to (1) meet BAT/BCT requirements; (2) reduce or prevent pollutants in storm water discharges from causing exceedances of receiving water objectives; and (3) determine what corrective action(s) were taken or will be taken and with a description of the schedule for completion.

    AND/OR:

    b. Are related to the run-on associated with the construction site location and whether additional BMPs measures are required to (1) meet BAT/BCT requirements; (2) reduce or prevent pollutants in storm water discharges from causing exceedances of receiving water objectives; and (3) what corrective action(s) were taken or will be taken with a description of the schedule for completion.

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION

PROPOSED DRAFT

HEARING PROCEDURE FOR
ADMINISTRATIVE CIVIL LIABILITY COMPLAINT
NO. R9-2015-0110
ISSUED TO

SAN ALTOS-LEMON GROVE, LLC
VALENCIA HILLS CONSTRUCTION SITE

SCHEDULED FOR **DECEMBER 16, 2015**

PLEASE READ THIS HEARING PROCEDURE CAREFULLY. FAILURE TO COMPLY WITH THE DEADLINES AND OTHER REQUIREMENTS CONTAINED HEREIN MAY RESULT IN THE EXCLUSION OF YOUR DOCUMENTS AND/OR TESTIMONY.

Background

The Assistant Executive Officer of the California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) has issued an Administrative Civil Liability (ACL) Complaint pursuant to California Water Code (Water Code) sections 13323 and 13385 against San Altos-Lemon Grove, LLC (Discharger) alleging it has violated California State Water Resources Control Board (State Water Board) Order No. 2009-0009-DWQ, as amended; Water Code section 13376; the Water Quality Control Plan for the San Diego Basin; and Clean Water Act section 301. The ACL Complaint proposes that administrative civil liability in the amount of **$848,374** be imposed as authorized by Water Code section 13385. Unless the Discharger waives its right to a hearing and pays the proposed liability, a hearing will be held before the San Diego Water Board on **December 16, 2015**, in San Diego.

Purpose of Hearing

The purpose of the hearing is to receive relevant evidence and testimony regarding the proposed ACL Complaint. At the hearing, the San Diego Water Board will consider whether to adopt, modify, or reject the proposed assessment. The hearing will be held at the San Diego Water Board office at 2375 Northside Drive, Suite 100, in San Diego. An agenda for the hearing will be issued at least ten (10) days before the hearing and will be posted on the San Diego Water Board's web page at: www.waterboards.ca.gov/sandiego.

Hearing Procedure

The hearing will be conducted in accordance with this hearing procedure. This proposed draft version of the hearing procedure has been prepared by the Prosecution Team, and is subject to revision and approval by the San Diego Water Board's Advisory Team. A copy of the procedures governing an adjudicatory hearing before the San Diego Water Board may be found at Title 23 of the California Code of Regulations, section 648 et seq., and is available at http://www.waterboards.ca.gov or upon request. In accordance with section 648(d), any procedure not provided by this Hearing Procedure is deemed waived. Except as provided in Title 23 of the California Code of Regulations (CCR), section 648(b), Chapter 5 of the Administrative Procedures Act (commencing with section 11500 of the Government Code) does not apply to adjudicatory hearings before the San Diego Water Board. This Notice provides additional requirements and deadlines related to the proceeding.

THE PROCEDURE AND DEADLINES HEREIN MAY BE AMENDED BY THE ADVISORY TEAM IN ITS DISCRETION. **ANY OBJECTIONS TO THE PROPOSED PROCEDURE MUST BE RECEIVED BY CATHERINE HAGAN, SENIOR STAFF COUNSEL, NO LATER THAN OCTOBER 26, 2015, OR THEY WILL BE WAIVED.** FAILURE TO COMPLY WITH THE DEADLINES AND REQUIREMENTS CONTAINED HEREIN MAY RESULT IN THE EXCLUSION OF DOCUMENTS AND/OR TESTIMONY.

Hearing Participation

Participants in this proceeding are either "designated parties" or "interested persons." Designated parties to the hearing may present evidence and cross-examine witnesses and are subject to cross-examination. Interested persons may present non-evidentiary policy statements, but may not cross-examine witnesses and are not subject to cross-examination. Interested persons generally may not present evidence (e.g., photographs, eye-witness testimony, monitoring data). Both designated parties and interested persons may be asked to respond to clarifying questions from the San Diego Water Board, staff, or others, at the discretion of the San Diego Water Board.

The following participants are hereby designated parties in this proceeding:

1. San Diego Water Board Prosecution Team; and
2. San Altos-Lemon Grove, LLC.

Requesting Designated Party Status

Persons who wish to participate in the hearing as a designated party, and are not already listed above, shall request party status by submitting a request in writing (with copies to the existing designated parties) no later than 5:00 p.m. on **October 26, 2015**, to Catherine Hagan, Senior Staff Counsel, at the address set forth below. The request shall include an explanation of the basis for status as a designated party (e.g., how the issues to be addressed in the hearing and the potential actions by the San Diego Water Board affect the person), the information required of designated parties as provided below, and a statement explaining why the party or parties designated above do not adequately represent the person's interest. Any opposition to the request must be submitted by 5:00 p.m. on **October 30, 2015**. The parties will be notified by 5:00 p.m. on **November 6, 2015**, as to whether the request has been granted or denied.

Contacts

Advisory Team:[1]

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[1] Additional staff may be designated as advisory staff with the Final Hearing Procedures.

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Discharger:

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Separation of Functions

To help ensure the fairness and impartiality of this proceeding, the functions of those who will act in a prosecutorial role by presenting evidence for consideration by the San Diego Water Board (Prosecution Team) have been separated from those who will provide advice to the San Diego Water Board (Advisory Team). Members of the Advisory Team[1] include Catherine Hagan, Senior Staff Counsel, and Deborah Jayne, Senior Environmental Scientist. Members of the Prosecution Team are: Laura Drabandt, Senior Staff Counsel; James Smith, Assistant Executive Officer; Jeremy Haas, Environmental Program Manager; Chiara Clemente, Senior Environmental Scientist; Laurie Walsh, Senior Water Resource Control Engineer; Wayne Chiu, Water Resource Control Engineer; and Frank Melbourn, Water Resource Control Engineer.

Ex Parte Communications

The designated parties and interested persons are forbidden from engaging in *ex parte* communications regarding this matter with members of the Advisory Team or members of the San Diego Water Board. An *ex parte* contact is any written or verbal communication pertaining to the investigation, preparation, or prosecution of the ACL Complaint between a member of a designated party or interested party on the one hand, and a San Diego Water Board member or an Advisory Team member on the other hand, unless the communication is copied to all other designated and interested parties (if written) or made at a proceeding open to all other parties and interested persons (if verbal). Communications regarding non-controversial procedural matters are not *ex parte* contacts and are not restricted. Communications among the designated and interested parties themselves are not ex parte contacts.

Hearing Time Limits

To ensure that all participants have an opportunity to participate in the hearing, the following time limits shall apply: each designated party shall have a combined twenty (20) minutes to present evidence, cross-examine witnesses (if warranted), and provide a closing statement; and each interested person shall have three (3) minutes to present a non-evidentiary policy statement. Participants with similar interests or comments are requested to make joint presentations, and participants are requested to avoid redundant comments. Participants who would like additional time must submit their request to the Advisory Team no later than **November 24, 2015.** Additional time may be provided at the discretion of the Advisory Team (prior to the hearing) or the San Diego Water Board (at the hearing) upon a showing that additional time is necessary.

Submission of Evidence and Policy Statements

The following information must be submitted in advance of the hearing:

1. All evidence (other than witness testimony to be presented orally at the hearing) that the Designated Party would like the San Diego Water Board to consider. Evidence and exhibits already in the public files of the San Diego Water Board may be submitted by reference as long as the exhibits and their location are clearly identified in accordance with Title 23, California Code of Regulations, section 648.3.
2. All legal and technical arguments or analysis.
3. The name of each witness, if any, whom the designated party intends to call at the hearing, the subject of each witness' proposed testimony, and the estimated time required by each witness to present direct testimony.
4. The qualifications of each expert witness, if any.
5. (Discharger only) If the Discharger intends to argue an inability to pay the civil liability proposed in the Complaint (or an increased or decreased amount as may be imposed by the San Diego Water Board), the Discharger should submit supporting evidence as set forth in the "ACL Fact Sheet" under "Factors that must be considered by the Board."
6. (Discharger only) If the Discharger would like to propose a Supplemental Environmental Project (SEP) or Enhanced Compliance Action (ECA) in lieu of paying some or all of the civil liability in accordance with the State Water Board's Water Quality Enforcement Policy, the Discharger shall submit a detailed SEP or ECA proposal including a specific implementation timetable.

The Prosecution Team shall submit two (2) hard copies and one (1) electronic copy of the information to Catherine Hagan, Senior Staff Counsel, so that it is received no later than 5:00 p.m. on **November 6, 2015**.

The remaining designated parties shall submit two (2) hard copies and one (1) electronic copy of the information to Catherine Hagan, Senior Staff Counsel, so that they are received no later than 5:00 p.m. on **November 13, 2015**.

In addition to the foregoing, each designated party shall send one (1) copy of the above information to each of the other designated parties by 5:00 p.m. on the deadline specified above.

Interested persons who would like to submit written non-evidentiary policy statements are encouraged to submit them to Catherine Hagan, Senior Staff Counsel, as early as possible, but they must be received by **November 24, 2015**. Interested persons do not need to submit written comments in order to speak at the hearing.

In accordance with Title 23, California Code of Regulations, section 648.4, the San Diego Water Board endeavors to avoid surprise testimony or evidence. Absent a showing of good cause and lack of prejudice to the parties, the San Diego Water Board may exclude evidence and testimony that is not submitted in accordance with this hearing procedure. Excluded evidence and testimony will not be considered by the San Diego Water Board and will not be included in the administrative record for this proceeding. PowerPoint and other visual presentations may be used at the hearing, but their content may not exceed the scope of other submitted written material. A copy of such material intended to be presented at the hearing must be submitted to the Advisory Team at or before the hearing for inclusion in the administrative record. Additionally, any witness who has submitted written testimony for the hearing shall appear at the hearing and affirm that the written testimony is true and correct, and shall be available for cross-examination.

Request for Pre-hearing Conference

A designated party may request that a pre-hearing conference be held before the hearing in accordance with Water Code section 13228.15. A pre-hearing conference may address any of the matters described in subdivision (b) of Government Code section 11511.5. Requests must contain a description of the issues proposed to be discussed during that conference, and must be submitted to the Advisory Team, with a copy to all other designated parties, no later than 5:00 p.m. on **November 18, 2015.**

Evidentiary Objections

Any designated party objecting to written evidence or exhibits submitted by another designated party must submit a written objection so that it is received by 5:00 p.m. on **November 24, 2015**, to the Advisory Team with a copy to all other designated parties. The Advisory Team will notify the parties about further action to be taken on such objections and when that action will be taken.

Evidentiary Documents and File

The Complaint and related evidentiary documents are on file and may be inspected or copied at the San Diego Water Board office at 2375 Northside Drive, Suite 100, San Diego, California 92108. This file shall be considered part of the official administrative record for this hearing. Other submittals received for this proceeding will be added to this file and will become a part of the administrative record absent a contrary ruling by the San Diego Water Board. Many of these documents are also posted online at www.waterboards.ca.gov/sandiego. Although the web page is updated regularly, to ensure access to the latest information, you may contact Catherine Hagan, Senior Staff Counsel.

Questions

Questions concerning this proceeding may be addressed to Catherine Hagan, Senior Staff Counsel.

IMPORTANT DEADLINES

October 19, 2015	Prosecution Team issues Amended ACL Complaint to Discharger and Advisory Team, sends proposed Hearing Procedure to Discharger and Advisory Team, and publishes Public Notice.
October 26, 2015	Objections due on proposed Hearing Procedure.
October 26, 2015	Deadline for submission of request for designated party status.
October 30, 2015	Deadline for opposition to request for designated party status.
October 30, 2015	Dischargers' deadline for waiving right to hearing.
November 6, 2015	Prosecution Team's deadline for submission of all information required under "Evidence and Policy Statements," above.
November 6, 2015	Advisory Team issues Hearing Procedure, and issues decision on requests for designated party status, if any.
November 13, 2015	Remaining Designated Parties' Deadline for submission of all information required under "Evidence and Policy Statements," above.
November 18, 2015	All Designated Parties' deadline for submission of request for pre-hearing conference.
November 24, 2015	All Designated Parties' deadline for submission of rebuttal evidence (if any) and evidentiary objections.
November 24, 2015	Interested Parties' deadline for submission of non-evidentiary policy statements.
December 16, 2015	Hearing.

PROPOSED

CATHERINE G. HAGAN
Senior Staff Counsel

Date

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION

REVISED HEARING PROCEDURE FOR
ADMINISTRATIVE CIVIL LIABILITY COMPLAINT
NO. R9-2015-0110
ISSUED TO

SAN ALTOS-LEMON GROVE, LLC
VALENCIA HILLS CONSTRUCTION SITE

SCHEDULED FOR **MARCH 9, 2016**

PLEASE READ THIS HEARING PROCEDURE CAREFULLY. FAILURE TO COMPLY WITH THE DEADLINES AND OTHER REQUIREMENTS CONTAINED HEREIN MAY RESULT IN THE EXCLUSION OF YOUR DOCUMENTS AND/OR TESTIMONY.

Background

The Assistant Executive Officer of the California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) has issued an Administrative Civil Liability (ACL) Complaint pursuant to California Water Code (Water Code) sections 13323 and 13385 against San Altos-Lemon Grove, LLC (Discharger) alleging it has violated California State Water Resources Control Board (State Water Board) Order No. 2009-0009-DWQ, as amended; Water Code section 13376; the Water Quality Control Plan for the San Diego Basin; and Clean Water Act section 301. The ACL Complaint proposes that administrative civil liability in the amount of **$848,374** be imposed as authorized by Water Code section 13385. Unless the Discharger waives its right to a hearing and pays the proposed liability, a hearing will be held before the San Diego Water Board on **March 9, 2016**, in San Diego.

Purpose of Hearing

The purpose of the hearing is to receive relevant evidence and testimony regarding the proposed ACL Complaint. At the hearing, the San Diego Water Board will consider whether to adopt, modify, or reject the proposed assessment. The hearing will be held at the San Diego Water Board office at 2375 Northside Drive, Suite 100, in San Diego. An agenda for the hearing will be issued at least ten (10) days before the hearing and will be posted on the San Diego Water Board's web page at: www.waterboards.ca.gov/sandiego.

Hearing Procedure

The hearing will be conducted in accordance with this hearing procedure. A copy of the procedures governing an adjudicatory hearing before the San Diego Water Board may be found at Title 23 of the California Code of Regulations, section 648 et seq., and is available at http://www.waterboards.ca.gov or upon request. In accordance with section 648(d), any procedure not provided by this Hearing Procedure is deemed waived. Except as provided in Title 23 of the California Code of Regulations (CCR), section 648(b), Chapter 5 of the Administrative Procedures Act (commencing with section 11500 of the Government Code) does not apply to adjudicatory hearings before the San Diego Water Board. This Notice provides additional requirements and deadlines related to the proceeding.

THE PROCEDURE AND DEADLINES HEREIN MAY BE AMENDED BY THE ADVISORY TEAM IN ITS DISCRETION. **ANY OBJECTIONS TO THE PROPOSED PROCEDURE MUST BE RECEIVED BY CATHERINE HAGAN, SENIOR STAFF COUNSEL, NO LATER THAN NOVEMBER 20,[1] 2015, OR THEY WILL BE WAIVED.** FAILURE TO COMPLY WITH THE DEADLINES AND REQUIREMENTS CONTAINED HEREIN MAY RESULT IN THE EXCLUSION OF DOCUMENTS AND/OR TESTIMONY.

Hearing Participation

Participants in this proceeding are either "designated parties" or "interested persons." Designated parties to the hearing may present evidence and cross-examine witnesses and are subject to cross-examination. Interested persons may present non-evidentiary policy statements, but may not cross-examine witnesses and are not subject to cross-examination. Interested persons generally may not present evidence (e.g., photographs, eye-witness testimony, monitoring data). Both designated parties and interested persons may be asked to respond to clarifying questions from the San Diego Water Board, staff, or others, at the discretion of the San Diego Water Board.

The following participants are hereby designated parties in this proceeding:

1. San Diego Water Board Prosecution Team; and
2. San Altos-Lemon Grove, LLC.

[1] By email dated November 23, 2015, this deadline was extended to November 25.

Requesting Designated Party Status

Persons who wish to participate in the hearing as a designated party, and are not already listed above, shall request party status by submitting a request in writing (with copies to the existing designated parties) no later than 5:00 p.m. on **November 20, 2015**,[2] to Catherine Hagan, Senior Staff Counsel, at the address set forth below. The request shall include an explanation of the basis for status as a designated party (e.g., how the issues to be addressed in the hearing and the potential actions by the San Diego Water Board affect the person), the information required of designated parties as provided below, and a statement explaining why the party or parties designated above do not adequately represent the person's interest. Any opposition to the request must be submitted by 5:00 p.m. on **November 23, 2015**. The parties will be notified by 5:00 p.m. on **December 4, 2015**, as to whether the request has been granted or denied.

Contacts

Advisory Team:[3]

Catherine George Hagan, Senior Staff Counsel
State Water Resources Control Board, Office of Chief Counsel
c/o San Diego Water Board
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Catherine.hagan@waterboards.ca.gov
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David Gibson, Executive Officer
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(619) 516-1990

Deborah Jayne, Senior Environmental Scientist

[2] By email dated November 23, 2015, this deadline and the deadline for opposition to requests were extended to November 25 and November 30 respectively.
[3] Additional staff may be designated as advisory staff with the Final Hearing Procedures or at a later date.

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Prosecution Team:

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Ben C. Anderson, Legally Responsible Person
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Carlsbad, CA 92008
kimberlyv@bcadevelopment.com
(714) 966-1544

Separation of Functions

To help ensure the fairness and impartiality of this proceeding, the functions of those who will act in a prosecutorial role by presenting evidence for consideration by the San Diego Water Board (Prosecution Team) have been separated from those who will provide advice to the San Diego Water Board (Advisory Team). Members of the Advisory Team[1] include Catherine George Hagan and Adriana Nunez, Staff Counsel, Deborah Jayne, Senior Environmental Scientist and Beatrice Griffey, Engineering Geologist. Members of the Prosecution Team are: Laura Drabandt, Senior Staff Counsel; James Smith, Assistant Executive Officer; Jeremy Haas, Environmental Program Manager; Chiara Clemente, Senior Environmental Scientist; Laurie Walsh, Senior Water Resource Control Engineer; Wayne Chiu, Water Resource Control Engineer; and Frank Melbourn, Water Resource Control Engineer.

Ex Parte Communications

The designated parties and interested persons are forbidden from engaging in *ex parte* communications regarding this matter with members of the Advisory Team or members of the San Diego Water Board. An *ex parte* contact is any written or verbal communication pertaining to the investigation, preparation, or prosecution of the ACL Complaint between a member of a designated party or interested party on the one hand, and a San Diego Water Board member or an Advisory Team member on the other hand, unless the communication is copied to all other designated and interested parties (if written) or made at a proceeding open to all other parties and interested persons (if verbal). Communications regarding non-controversial procedural matters are not *ex parte* contacts and are not restricted. Communications among the designated and interested parties themselves are not ex parte contacts.

Hearing Time Limits To ensure that all participants have an opportunity to participate in the hearing, the following time limits shall apply: each designated party shall have a combined ninety (90) minutes to present evidence, cross-examine witnesses (if warranted), and provide a closing statement; and each interested person shall have three (3) minutes to present a non-evidentiary policy statement. Participants with similar interests or comments are requested to make joint presentations, and participants are requested to avoid redundant comments. Participants who would like additional time must submit their request to the Advisory Team no later than **February 19, 2016**. Additional time may be provided at the discretion of the Advisory Team (prior to the hearing) or the San Diego Water Board (at the hearing) upon a showing that additional time is necessary.

Submission of Evidence and Policy Statements
The following information must be submitted in advance of the hearing:

1. All evidence (other than witness testimony to be presented orally at the hearing) that the Designated Party would like the San Diego Water Board to consider. Evidence and exhibits already in the public files of the San Diego Water Board may be submitted by reference as long as the exhibits and their location are clearly identified in accordance with Title 23, California Code of Regulations, section 648.3.
2. All legal and technical arguments or analysis.
3. The name of each witness, if any, whom the designated party intends to call at the hearing, the subject of each witness' proposed testimony, and the estimated time required by each witness to present direct testimony.
4. The qualifications of each expert witness, if any.
5. (Discharger only) If the Discharger intends to argue an inability to pay the civil liability proposed in the Complaint (or an increased or decreased amount as may be imposed by the San Diego Water Board), the Discharger should submit supporting evidence as set forth in the "ACL Fact Sheet" under "Factors that must be considered by the Board."
6. (Discharger only) If the Discharger would like to propose a Supplemental Environmental Project (SEP) or Enhanced Compliance Action (ECA) in lieu of paying some or all of the civil liability in accordance with the State Water Board's Water Quality Enforcement Policy, the Discharger shall submit a detailed SEP or ECA proposal including a specific implementation timetable.

The Prosecution Team shall submit two (2) hard copies and one (1) electronic copy of the information to Catherine Hagan, Senior Staff Counsel, so that it is received no later than 5:00 p.m. on **November 30, 2015**.[4]

[4] By email dated November 23, 2015, this deadline was extended to December 4, 2015.

The remaining designated parties shall submit two (2) hard copies and one (1) electronic copy of the information to Catherine Hagan, Senior Staff Counsel, so that they are received no later than 5:00 p.m. on **February 3, 2016**.

In addition to the foregoing, each designated party shall send one (1) copy of the above information to each of the other designated parties by 5:00 p.m. on the deadline specified above.

Interested persons who would like to submit written non-evidentiary policy statements are encouraged to submit them to Catherine Hagan, Senior Staff Counsel, as early as possible, but they must be received by **February 19, 2016**. Interested persons do not need to submit written comments in order to speak at the hearing.

In accordance with Title 23, California Code of Regulations, section 648.4, the San Diego Water Board endeavors to avoid surprise testimony or evidence. Absent a showing of good cause and lack of prejudice to the parties, the San Diego Water Board may exclude evidence and testimony that is not submitted in accordance with this hearing procedure. Excluded evidence and testimony will not be considered by the San Diego Water Board and will not be included in the administrative record for this proceeding. PowerPoint and other visual presentations may be used at the hearing, but their content may not exceed the scope of other submitted written material. A copy of such material intended to be presented at the hearing must be submitted to the Advisory Team at or before the hearing for inclusion in the administrative record. Additionally, any witness who has submitted written testimony for the hearing shall appear at the hearing and affirm that the written testimony is true and correct, and shall be available for cross-examination.

Request for Pre-hearing Conference

A designated party may request that a pre-hearing conference be held before the hearing in accordance with Water Code section 13228.15. A pre-hearing conference may address any of the matters described in subdivision (b) of Government Code section 11511.5. Requests must contain a description of the issues proposed to be discussed during that conference, and must be submitted to the Advisory Team, with a copy to all other designated parties, no later than 5:00 p.m. on **February 17, 2016**.

Evidentiary Objections

Any designated party objecting to written evidence or exhibits submitted by another designated party must submit a written objection so that it is received by 5:00 p.m. on **February 17, 2016**, to the Advisory Team with a copy to all other designated parties. The Advisory Team will notify the parties about further action to be taken on such objections and when that action will be taken.

Evidentiary Documents and File

The Complaint and related evidentiary documents are on file and may be inspected or copied at the San Diego Water Board office at 2375 Northside Drive, Suite 100, San Diego, California 92108. This file shall be considered part of the official administrative record for this hearing. Other submittals received for this proceeding will be added to this file and will become a part of the administrative record absent a contrary ruling by the San Diego Water Board. Many of these documents are also posted online at www.waterboards.ca.gov/sandiego. Although the web page is updated regularly, to ensure access to the latest information, you may contact Catherine Hagan, Senior Staff Counsel.

Questions

Questions concerning this proceeding may be addressed to Catherine Hagan, Senior Staff Counsel.

IMPORTANT DEADLINES

October 19, 2015	Prosecution Team issues ACL Complaint to Discharger and Advisory Team, sends proposed Hearing Procedure to Discharger and Advisory Team, and publishes Public Notice.
November 20, 2015[5]	Objections due on proposed Hearing Procedure.
November 20, 2015	Deadline for submission of request for designated party status.
November 23, 2015[6]	Deadline for opposition to request for designated party status.
November 30, 2015[7]	Prosecution Team's deadline for submission of all information required under "Evidence and Policy Statements," above.
December 4, 2015	Advisory Team issues Hearing Procedure, and issues decision on requests for designated party status, if any.
February 3, 2016	Remaining Designated Parties' Deadline for submission of all information required under "Evidence and Policy Statements," above.
February 17, 2016	All Designated Parties' deadline for submission of request for pre-hearing conference.
February 17, 2016	All Designated Parties' deadline for submission of rebuttal evidence (if any) and evidentiary objections.
February 19, 2016	Interested Parties' deadline for submission of non-evidentiary policy statements.
March 9, 2016	Hearing.

Catherine George Hagan 12-28-15

CATHERINE GEORGE HAGAN
Senior Staff Counsel

Date

[5] By email dated November 23, this and the next deadline were extended to November 25.
[6] By email dated November 23, this date was extended to November 30.
[7] By email dated November 23, this date was extended to December 4.

From: Drabandt, Laura@Waterboards [Laura.Drabandt@waterboards.ca.gov]
Sent: Tuesday, February 02, 2016 9:25 AM
To: Hagan, Catherine@Waterboards; Wayne Rosenbaum (swr@envirolawyer.com)
Cc: Linda Beresford (lindab@envirolawyer.com); 'Josh Rosenbaum' (jtrosenb@gmail.com); Boyers, David@Waterboards; Clemente, Chiara@Waterboards; Melbourn, Frank@Waterboards
Subject: ACL R9-2015-0110 Request to Submit Additional Evidence - San Altos Lemon Grove, LLC

Dear Ms. Hagan,

As you are already aware, the attorneys for Discharger San Altos Lemon Grove, LLC, have deposed San Diego Regional Board staff, along with City of Lemon Grove staff and their subcontractor's employees in preparation for the hearing on this ACL now scheduled for March 9, 2016. As a result of these depositions, the Prosecution Team is requesting to supplement the evidence already submitted with additional photos and reports, rainfall data, and better quality copies of some photos already in evidence.

The Discharger's attorneys subpoenaed documents from the City of Lemon Grove staff and D-Max Engineering, Inc., employees who inspected the site on behalf of the City. The City's document production included numerous photos of the site that were not previously in Regional Board staff's possession. The Prosecution now seeks to include 75 photos from the City. Both parties have possessed these photos since late December.

We also seek to admit six reports from the Discharger's contracted Qualified Stormwater Professional (QSP) that contain additional photos of the site and weather information; a memo from D-Max Engineering describing a site visit in May; City inspector notes and a letter from December 2014; notes from the Discharger's BMP walk in January 2015; the Discharger's NOV Response; and the site's Storm Water Pollution Prevention Plan (SWPPP). The Discharger has possessed these items since before the complaint was issued. The Prosecution also asks to admit rainfall data from nearby NOAA stations and 29 more photos taken by Regional Board staff to facilitate discussion on specific topics that arose during the depositions. Finally, we seek to submit full-sized copies of 32 photos already contained in the Exhibits submitted on December 4, 2015, and one in the Technical Analysis for easier use at the hearing.

The Discharger's evidence submittal is due this Wednesday, February 3. We can provide two hard copies and one electronic copy of the information to you and an electronic copy to the Discharger on the same day (we can also provide a hard copy to the Discharger's attorneys if they would like one). The Discharger would have until February 17 to rebut any of the evidence. If there are any objections to the new evidence, we will agree to any date before or by February 17 to accommodate the Advisory Team to make any necessary rulings on it.

Thank you for your consideration,
Laura Drabandt
Attorney for the Prosecution

Laura J. Drabandt, Staff Counsel III
Office of Enforcement
State Water Resources Control Board
1001 I Street, P.O. Box 100
Sacramento, CA 95812
(916) 341-5180

EXHIBIT N

BLUEBIRDonline.com (888) 477 - 0700 A 617

From: Wayne Rosenbaum [swr@envirolawyer.com]
Sent: Tuesday, February 02, 2016 1:49 PM
To: Hagan, Catherine@Waterboards
Cc: Linda Beresford; 'Josh Rosenbaum' (jtrosenb@gmail.com); Boyers, David@Waterboards; Clemente, Chiara@Waterboards; Melbourn, Frank@Waterboards; Drabandt, Laura@Waterboards
Subject: ACL R9-2015-0110 Opposition to Request to Submit Additional Evidence - San Altos Lemon Grove, LLC

Dear Ms. Hagan,

San Altos strenuously objects to the Prosecution's request to submit additional evidence at this late date. Submission of surprise evidence contemporaneously with the requirement for San Altos to submit its opening brief and evidence is a gross violation of due process and a clear violation of the State Water Board's Water Quality Enforcement Policy which mandates that enforcement actions be "firm, fair and consistent." If the Prosecution wishes to amend its complaint or supplement the evidence it relies on to support the complaint at this late date it must be required to adhere to one of the three options below.

The Prosecution seeks to introduce a raft of new evidence including:

- Seventy five additional photos allegedly taken by the City of Lemon Grove
- Six reports from the Discharger's contracted Qualified Stormwater Professional (QSP) that contain additional photos of the site and weather information;
- A memo from D-Max Engineering describing a site visit in May;
- City inspector notes and a letter from December 2014;
- Notes from the Discharger's BMP walk in January 2015;
- The Discharger's NOV Response; and the site's Storm Water Pollution Prevention Plan (SWPPP);
- Rainfall data from nearby NOAA stations;
- Twenty nine more photos taken by Regional Board staff; and
- Full-sized copies of 32 photos already contained in the Exhibits

First, the submission of this evidence is improper. The Prosecution spent 200 hours drafting its complaint and had over a month to collect and submit its evidence following the issuance of the Complaint. The Prosecution had a full and fair opportunity to take its own depositions, subpoena documents, and collect the evidence on which it intended to rely. It chose not to do so. Furthermore, the Prosecution had either possession of or access to many (if not all) of these documents before December 4, 2015, including the Discharger's NOV Response, the site Storm Water Pollution prevention Plan, rainfall data from nearby NOAA stations, all of the photos taken by Regional Board staff, or full-sized copies of any photos. The fact that both parties may have possessed these additional documents is completely irrelevant.

Second, San Altos has already undertaken extremely expensive and time-consuming discovery based on the Prosecution's submission of evidence. San Altos is submitting its evidence tomorrow in reliance on the testimony provided by Water Board staff regarding what information it relies on for the basis of its complaint. San Altos has no idea what the Prosecution intends to use these documents to prove. Moreover, based on the current schedule approved by the Chair of the Regional Board the Prosecution suggests that San Altos would have ten business days to conduct additional discovery regarding this mountain of new evidence, depose the 3rd parties or members of the prosecution and prepare a rebuttal brief is grossly unfair (both in terms of time and cost) and in fact an impossibility given that subpoenas are expected to provide ten days' notice of any deposition. To adequately address these tasks in ten business days is an impossibility. Such a schedule is arbitrary, capricious and makes a mockery of due process guarantees.

If the Prosecution believes that the evidence it has already submitted is inadmissible or insufficient to prove up the allegations in the complaint, the Prosecution has three alternative remedies to which San Altos would not object:

1. The Prosecution can request that the advisory team toll the schedule while the Parties enter into meaningful settlement discussions. The Water Quality Enforcement Policy provides "It is appropriate to adjust the administrative civil liabilities calculated pursuant to the methodology in consideration of hearing and/or litigation risks including: equitable factors, mitigating circumstances, evidentiary issues, or other weaknesses in the enforcement action that the prosecution reasonably believes may adversely affect the team's ability to obtain the calculated liability from the administrative hearing body." If San Altos and the Prosecution cannot come to a settlement, then the schedule would be restarted and the Prosecution could either appeal the schedule or dismiss the complaint with leave to amend.

2. The Prosecution can comply with the procedures set forth in your letter dated December 28, 2015 and seek a modification to the schedule from the Chair of the Regional Water Quality Control Board, during which time the schedule would proceed as outlined in your letter. Your letter states, "Any further request for reconsideration of the above ruling should be submitted in writing with any legal argument to [Ms. Hagan]." "[Ms. Hagan] will provide an opportunity for a response before making any recommendations to the Chair." Before responding to this request, we ask that the Prosecution be required to submit a legal argument to you, that we be provided a more reasonable opportunity to fully respond (as the parties did when San Altos requested an extension of time in mid-December), and that both arguments be submitted to the Chair of the Board.

3. The Prosecution can dismiss the ACL with leave to amend.

Any other approach is extremely prejudicial and a violation of due process to San Altos.

S. Wayne Rosenbaum
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EXHIBIT O

From: Hagan, Catherine@Waterboards [Catherine.Hagan@waterboards.ca.gov]
Sent: Tuesday, February 02, 2016 4:32 PM
To: Drabandt, Laura@Waterboards; Wayne Rosenbaum (swr@envirolawyer.com) (swr@envirolawyer.com)
Cc: Linda Beresford (lindab@envirolawyer.com); 'Josh Rosenbaum' (jtrosenb@gmail.com); Clemente, Chiara@Waterboards; Melbourn, Frank@Waterboards; Boyers, David@Waterboards; Gibson, David@Waterboards; Nunez, Adriana@Waterboards; Jayne, Deborah@Waterboards
Subject: ACL Complaint No. R9-2015-0110, San Altos-Lemon Grove, LLC

To the Parties to ACLC No. R9-2015-0110:

The Advisory Team has received both the Prosecution Team's request to supplement their evidence in support of ACL Complaint No. R9-2015-0110 and San Altos-Lemon Grove, LLC's (Discharger) objections to the Prosecution Team's request. By noon **Thursday, February 4**, the Prosecution Team shall submit to the Advisory Team the proposed evidence (electronically and one hard copy) together with a response to the Discharger's objections. The Prosecution Team's response should explain why the Discharger will not be prejudiced by the submittal, why the evidence was not submitted earlier, and confirm that the evidence is not submitted to support changes to the complaint. The Prosecution Team shall copy the Discharger on the response and must provide the Discharger with copies of any proposed evidence the Discharger may not already have. **The February 3 deadline for the Discharger to submit Evidence and Policy Statements *is extended* one week to February 10 at 5 p.m.** The Advisory Team will rule on the Prosecution Team's request as soon as practicable after receiving the Prosecution Team's response.

Sincerely,

Catherine George Hagan
Senior Staff Counsel
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