

#23



Kim Dawson <kim.dawson@edcgov.us>

Fw: Comments on revised EIR for El Dorado Lime Kiln High pH sludge

1 message

trails-first@att.net <trails-first@att.net>
Reply-To: trails-first@att.net
To: "kim.dawson@edcgov.us" <kim.dawson@edcgov.us>

Mon, May 2, 2016 at 12:23 PM

LATE DISTRIBUTION
DATE 5/2/16
BOS 5/3/16

--- Forwarded Message ---

From: "trails-first@att.net" <trails-first@att.net>
To: "jim.mitrisin@edcgov.us" <jim.mitrisin@edcgov.us>
Sent: Monday, May 2, 2016 12:21 PM
Subject: Fw: Comments on revised EIR for El Dorado Lime Kiln High pH sludge

Dear Clerk; Please include my comments with attachments into the record for this item that is set to be heard on the May 3. 2016 Agenda.

If you have any questions or concerns, Please write or call me as soon as possible as time is of the essence.

Thank You
Steven Proe

Greenwood, Ca. 95635

--- Forwarded Message ---

From: "trails-first@att.net" <trails-first@att.net>
To: The BOSFOUR <bosfour@edcgov.us>
Sent: Monday, May 2, 2016 12:15 PM
Subject: Fw: Comments on revised EIR for El Dorado Lime Kiln High pH sludge

Dear Supervisor: Please regard this as comment for tomorrows board meeting on the Lime Kiln Proposed EIR.:

File #: 16-0370 Version: 1

Type:	Agenda Item	Status:	Consent Calendar
File created:	4/1/2016	In control:	Board of Supervisors
On agenda:	5/3/2016	Final action:	
Community Development Agency, Transportation Division, recommending the Board take the following actions related to the Supplement to the Diamond Springs Parkway Project 2011 Environmental Impact Report for Phase1B Design			

Title:	Modification, Project 72334: 1) Adopt the California Environmental Quality Act Supplement to the 2011 Environmental Impact Report; and 2) Approve the Project as described in the California Environmental Quality Act document. FUNDING: The Project is funded by Local Tribe Funds (61%), Master Circulation & Funding Plan Financing (22%), Utility Agencies (12%), and Traffic Impact Mitigation Fees (5%). (No Federal Funds).
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Attachments:

1. A - App CRS 05-03-16, 2. B - Final DSP SEIR 05-03-16, 3. C - Draft DSP SEIR 05-03-16, 4. D - Findings of Fact DSP SEIR 05-03-16, 5. E - Vicinity Map 05-03-16

I was unable to locate the information on the Plume/discharge from this project site that is traveling/Flowing/Discharging under the Bike Trail into Weber Creek, within these documents so i have attached them for you information and to be entered into the Administrative Record for this proposed amended EIR on the Lime Kiln Board Packet.

I here by request that you enter these documents into the administrative Record for this proposed Agenda Item. I shall try to attend tomorrows Hearing by I am totally handicapped and it is difficult if not at times impossible to make trips of this duration.

Please Confirm in Writing that you have or will included this Significant New information into the Record in a Timely Manner.

If you have a need to contact me you may contact me 530-823-1662

Thank You

Steven Proe

Greenwood, CA. 95635

----- Forwarded Message -----

From: "trails-first@att.net" <trails-first@att.net>

To: "Marie.McCrink@waterboards.ca.gov" <Marie.McCrink@waterboards.ca.gov>

Sent: Monday, May 2, 2016 11:49 AM

Subject: Fw: Comments on revised EIR for El Dorado Lime Kiln High pH sludge

Good afternoon Ms. McCrink: I believe that you may have received this Information earlier.

I have sent this message to Mr. Floyd, apparently he is out of his office until the 3rd. of May, so I am contacting you to check the status of the Regional Water Board on This issue of Lime Kiln, LINDEMAN PROPERTY (T1000005927)Lime Kiln.

I cannot see where they are addressing the buried high pH lime sludge beneath the location that has been seeping out of the ground for many months now.

Please contact me as soon as possible as time is of the essence as the Hearing on this proposed action is set before the board Of Supervisors for May 3. 2016. Please reply to me in writing I am available for a phone call at 530-823-1662/

If you have responded to Cheryl Blychester on her request please just forward your response to Cheryl to me.

Thank You

Steven Proe

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From: "trails-first@att.net" <trails-first@att.net>

To: "walter.floyd@waterboards.ca.gov" <walter.floyd@waterboards.ca.gov>

Sent: Monday, May 2, 2016 11:30 AM

Subject: Fw: Comments on revised EIR for El Dorado Lime Kiln High pH sludge

Hi Mr. Floyd: have you had the opportunity to Comment on this proposed action.

Subject: Comments on revised EIR for El Dorado Lime Kiln High pH sludge

This was just brought to my attention that El Dorado County revised the EIR for the developments over the high pH Lime Kiln site. The comment period has closed, but they still have to take comments until the Board meeting on Tuesday. I do not know if any of you were given the opportunity to comment on the revised EIR. I cannot see where they are addressing the buried high pH lime sludge beneath the location that has been seeping out of the ground for many months now.

Regards,

Steven Proe

<https://eldorado.legistar.com/LegislationDetail.aspx?ID=2701803&GUID=49B64F9E-A572-46C0-A331-6C7EF01FC6F0>



Lindeman_13267(1).pdf
16978K



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Central Valley Regional Water Quality Control Board

19 February 2016

Mr. Michael Lindeman
27102 El Macero
El Macero, CA 95618

Dear Mr. Lindeman,

***ORDER TO SUBMIT TECHNICAL REPORTS, FORMER LIME KILN SITE,
ASSESSOR PARCEL NUMBERS 051-250-51 AND 051-250-54, DIAMOND SPRINGS,
EL DORADO COUNTY***

Central Valley Regional Water Quality Control Board is issuing the enclosed Technical Reporting Order (Order) for the former lime kiln site located on Assessor Parcel Numbers 051-250-51 and 051-250-54, Diamond Springs, El Dorado County (Site). The enclosed Order was issued in response to the identification of the Site as a source of high pH waters leaching from the former lime rock processing facility found to be polluting soil and groundwater beneath the Site, and leaching into unnamed waterways in the vicinity of the Site.

In the course of geotechnical investigations conducted on the Site, and in pH measurements obtained from the unnamed waterways in the vicinity of the Site, pH levels exceeding water quality standards greater than 8.5 and exceeding hazardous waste levels greater than 12.5 have been measured and recorded at the Site and in the unnamed waterways in the vicinity of the Site. A review of historic lime rock processing operations indicates the facility operated from the 1930's into the 1970s. Information documenting results of environmental investigations is available online from the state-wide Geotracker information system at the following web address:

http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T10000005927.

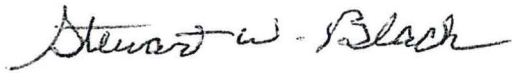
Alternatively, paper copies of the information can be made available for review at the Central Valley Water Board offices.

The enclosed Order requires preparation of a Technical Document to be submitted to this office by **01 May 2016**. **Prior to preparation of the Technical Document, please contact this office so we may discuss the scope of work to ensure that work conducted is adequate to comply with this Order.**

KARL E. LONGLEY ScD, P.E., CHAIR | PAMELA C. CREEDON P.E., BCEE, EXECUTIVE OFFICER

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | www.waterboards.ca.gov/centralvalley

If you have questions or would like to discuss the enclosed Order, you can contact the project manager, Walter Floyd, by phone at (916) 464-4651, or by email at walter.floyd@waterboards.ca.gov.

A handwritten signature in cursive script that reads "Stewart W. Black".

Stewart Black, P.G.
Site Cleanup Program Manager
Central Valley Regional Water Quality Control Board

Enclosure

cc: Gregory Stanton, El Dorado County, Environmental Management Division
Steve Dedretti, El Dorado County, Community Development Agency
Vern Pierson, El Dorado County, District Attorney

cc:

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION**

TECHNICAL REPORTING ORDER NO. R5-2016-0805
CALIFORNIA WATER CODE SECTION 13267

FOR

MICHAEL LINDEMAN

AND

THE LINDEMAN FAMILY TRUST

DIAMOND SPRINGS, EL DORADO COUNTY

This Order is being issued to Michael Lindeman and the Lindeman Family Trust pursuant (hereafter identified as Dischargers) to California Water Code section 13267, which authorizes the Executive Officer of the California Regional Water Quality Control Board, Central Valley Region (hereafter Central Valley Water Board or Board) to issue an Order (Order) requiring the submittal of technical reports.

The Executive Officer finds:

INTRODUCTION

1. The Dischargers own parcels APN 051-250-55, APN 051-250-54, and APN 051-250-51. For the purposes of this Order APNs 051-250-54 and 051-250-51 will be identified as the Site. The current known address of Michael Lindeman is 27102 El Macero, El Macero, CA 95618.
2. The Site is bounded on the east by Throwita Way, and on the northwest by Truck Street in Diamond Springs, El Dorado County.
3. APN 051-250-55 is the northernmost of the three parcels, located adjacent to Truck Street and Throwita Way. As of 2016, this parcel appears to be an improved property, zoned for industrial use, containing several structures and a paved asphalt road. A former landscaping business was once located here.
4. APN 051-250-54 is located centrally between APNs 051-250-55 and the southernmost parcel APN 051-250-51. Both the central and southern parcels border Throwita Way, and the southernmost parcel also borders the Municipal Recycling Facility (MRF).
5. The Site borders an unnamed tributary to the west. The tributary runs the length of the central and southern parcels, and enters a culvert located at the apex of parcel APN 051-250-54 and continues downstream to Weber Creek. A small drainage swale runs west to east along the El Dorado Trail bike path.
6. Attachment 1 contains a site plan and APN map.

BACKGROUND

7. Based upon reference material from El Dorado Irrigation District (1992), and a Youngdahl Consulting Group Geotechnical Engineering Report (2008) and the Diamond Springs Parkway Draft Environmental Report (Michael Brandman and Associates, Appendix H, Phase 1 Site Assessment

(2009)), the Site has been the location of a historical lime rock processing facility since the 1930's and continued through (at least) the 1970's. The Phase 1 Site Assessment indicates the lime processing plant was not operating in 1984.

8. In 2008 and 2009, reports issued for future development through the Site (Diamond Dorado Parkway) indicate the Site may contain hazardous materials from previous operations at the lime kiln facility. The 2008 Report contains information that documents prior exploratory activities in the form of soil borings and test pits. The borings and test pits do not contain analytical soil, groundwater or surface water results. The lithologic descriptions indicate "sludge" was present in several of the test pits. The location of the "sludge pits" is in close proximity to lime waste piles and various surface impoundments that were present at the Site during operations (base on photographic documentation). The 2008 Report also indicates that hazardous materials may be encountered, and that surface water, storm water runoff, and groundwater quality may be compromised by pollutant loading. The level for potential degradation of surface and groundwater/storm water was deemed significant. In certain areas of the site, the 2008 Report recommended additional subsurface exploration. The 2009 Report identifies the Site as containing Potential Recognized Environmental Conditions (P-Recs), and recommends that a Geotechnical Engineer be notified of unexpected observations during any future improvements at the site.
9. On 15 March 2011, the California Department of Fish and Wildlife (CDFW) received a Hazardous Materials Spill Report stating the tributary adjacent to the Site was impacted with lime waste material. On 17 March 2011, CDFW took photos of the impacted tributary and collected water samples for pH analysis. The pH of the tributaries ranged from 8.5 to 11.2.
10. In June 2012, Holdrege and Kull produced a Waste Mitigation Plan Report containing plans to regrade the Site. The Waste Mitigation Plan was directed by the CDFW in their June 3, 2011 *Memorandum, Biosignificance Report for Lime Discharge to Two Streams in El Dorado County, CA* (Carol Oz, 2011). The grading operations commenced in 2012. The CDFW issued a Notice of Violation to the Dischargers for failure to meet the conditions of the Waste Mitigation Plan.
11. The Site is zoned industrial, and recent activities since 2012 include unpermitted grading of the parcels comprising the Site. In 2013, Central Valley Water Board staff observed lime waste in the graded cap material at the Site. Embankment material and lime waste material was also present encroaching into the tributary. The "capping" material (obtained off site) is highly permeable and therefore, impacts from lime waste through surface leaching are probable, as indicated by the continued high pH.
12. From 2012 to the present, Central Valley Water Board staff has collected soil and surface water samples of the unnamed tributaries adjacent to the Lindeman parcels, as well as north, across the El Dorado Trail. The samples have consistently contained moderate to high pH (ranging from 8-12). The highest pH has consistently been located in samples north of the Lindeman parcels. This surface water runs through a culvert running underneath the El Dorado Trail during storm events. Recoverable metals are present in the surface water samples. The concentration of the metals varies, and until a Background Study has been completed, it is unknown if the metals present are background levels or the result of lime processing activities. The soil samples associated with the lime waste have exhibited burning of exposed skin and choking upon inhalation. Soil samples

collected in 2008 indicate a pH range of 8-11.89. In samples of high pH, chloride and sulfate are higher than those of lower pH.

13. The Dischargers are currently subject to the Construction General Permit (CGP) for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 2009-0009-DWQ. The permit requires a Storm Water Pollution Prevention Plan (SWPPP) that outlines how storm water will be managed to prevent construction related pollutants from discharging off the site.
14. The permit is currently active because the Dischargers have not met the termination requirements of the CGP. There are temporary plastic netted erosion control blankets that must be properly removed prior to termination of the permit.
15. Due to drought conditions, the tributaries remained stagnant until December 2015, when the occurrence of El Nino storm conditions caused significant quantities of sediment and subsurface and surface water to start filling the tributaries again. Samples collected by El Dorado County, Environmental Management Division in 2016 in similar sample locations as previous sampling yielded results consistent with previous findings.
16. Local citizens have filed numerous complaints due to the continuing nuisance and human health risk from lime waste impacts present in the tributaries and potential leaching associated with the unpermitted grading on the Site.
17. The Dischargers have not mitigated the lime waste/borrowed fill material present in the tributaries.
18. Surface water discharges to the retention pond and into the adjacent tributaries seasonally during the wet season.
19. Due to the spreading of lime waste throughout the Site during grading operations, the major source area of pollution (lime waste piles) is no longer contained as single units of waste material. The spreading has increased the surface area of impacted soil for potential leaching on a larger scale.

LEGAL PROVISIONS

20. The Central Valley Water Boards' *Water Quality Control Plan for the Sacramento River and San Joaquin River Basins, 4th Edition* (Basin Plan) designates beneficial uses of the waters of the State, establishes water quality objectives (WQOs) to protect these uses, and establishes implementation policies to implement WQOs. The designated beneficial uses of the tributaries, creeks and American River downstream of the discharge are municipal domestic and agricultural supply; water contact and non-contact recreation, groundwater recharge, fresh water replenishment, and preservation and enhancement of fish, wildlife and other aquatic resources.
21. California Water Code section 13267 states, in relevant part:

(b)(1) In conducting an investigation...the Regional Board may require that any person who has discharged or is discharging, or who proposes to discharge waste within its region... shall furnish, under penalty of perjury, technical or monitoring program reports which the Regional Board requires.

The burden, including costs of these reports, shall bear a reasonable relationship to the need for the report and the benefits obtained from the reports. In requiring those reports, the Regional Board shall provide the Dischargers with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring the Dischargers to provide the reports.

21. California Water Code section 13268 states, in relevant part:

(a)(1) Any person failing or refusing to furnish technical or monitoring reports as required by subdivision (b) of Section 13267...or falsifying any information provided therein, is guilty of a misdemeanor and may be liable civilly in accordance with subdivision (b).

(b)(1) Civil liability may be administratively imposed by a regional board in accordance with Article 2.5 (commencing with Section 13323) of Chapter 5 for a violation of subdivision (a) in an amount which shall not exceed one thousand dollars (\$1,000) for each day in which the violation occurs.

(c) Any person discharging hazardous waste as defined in Section 25117 of the Health and Safety Code, who knowingly fails or refuses to furnish technical or monitoring program reports as required by subdivision (b) of Section 13267, or who knowingly falsifies information provided in technical reports or monitoring program reports, is guilty of a misdemeanor, may be civilly liable in accordance with subdivision (d), and is subject to criminal penalties pursuant to subdivision (e).

(d)(1) Civil liability may be administratively imposed by the Regional Board for a violation of subdivision (c) in an amount which shall not exceed five thousand dollars (\$5,000) for each day in which the violation occurs.

22. Failure to submit the required Work Plan to the Central Valley Water Board according to the schedule detailed herein may result in enforcement action(s), which may include the imposition of administrative civil liability pursuant to California Water Code section 13268. The Central Valley Water Board reserves the right to take any enforcement action allowed by law.

23. California Water Code section 13173 states, in relevant part, the following:

“Designated waste” means either of the following:

(b) Nonhazardous waste that consists of, or contains, pollutants that, under ambient environmental conditions at a waste management unit, could be released in concentrations exceeding applicable water quality objectives or that could reasonably be expected to affect beneficial uses of the waters of the state as contained in the appropriate state water quality control plan.

24. Water that has come into contact with lime waste is classified as a designated waste because it has caused impacts to surface water and groundwater above affecting the beneficial uses of waters of the State.

As long as surface water can come into contact with the lime waste and continues to contain high concentrations of metals and alkalinity, it is considered a designated waste.

REQUIRED ACTIONS

IT IS HEREBY ORDERED that, pursuant to California Water Code section 13267:

1. **By 1 May 2016**, the Dischargers shall submit a Technical Document that provides the following information:
 - (a) A detailed description of the Site's storm water collection system, including any treatment system which will have an impact on the amount of storm water/ treatment waste water generated or removed from the Site.
 - (b) Available data regarding historic use at the Site, and locations of all structures, ponds and sumps that were present and what they contained;
 - (c) A compilation of all previous and recent site boring and trenching locations on an updated map;
 - (d) Specific locations of where lime waste and "sludge" were spread;
 - (e) A comprehensive plan for a subsurface investigation, included but not limited to, soil borings, trenching, collection of soil and groundwater samples, and geophysical surveying, to adequately characterize the site, evaluate cleanup alternatives, and develop a preliminary mitigation plan for abating the discharges;
 - (f) A comprehensive outline for future sampling of the tributaries where surface water is encountered, and groundwater monitoring wells where groundwater is encountered;
 - (g) A description of Best Management Practices (BMPs) and Site improvements that will be implemented to prevent lime waste from coming in contact with surface water or rainfall. A diagram showing process and storm water flows (quality and quantities) for handling and disposal shall be included; and
 - (h) A schedule for implementing the BMPs and/or the improvements necessary to bring the Site into compliance with the existing SWPPP Permit.
2. Prior to implementing the investigation activities contained in Item No. 1 (above), the Dischargers shall provide a detailed workplan and meet with the Central Valley Water Board staff to obtain approval of the planned investigation work.

REPORTING

3. As required by California Business and Professions Code, sections 6735, 7835 and 7835.1, the preparation of all reports shall be supervised and signed and stamped by a registered professional geologist or engineer licensed in the State of California.
4. Any person aggrieved by this action of the Central Valley Water Board may petition the State Water Board to review the action in accordance with California Water Code section 13320 and California

Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday. The petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at:

http://www.waterboards.ca.gov/public_notices/petitions/water_quality, or will be provided upon request.

This Order is effective upon the date of signature.

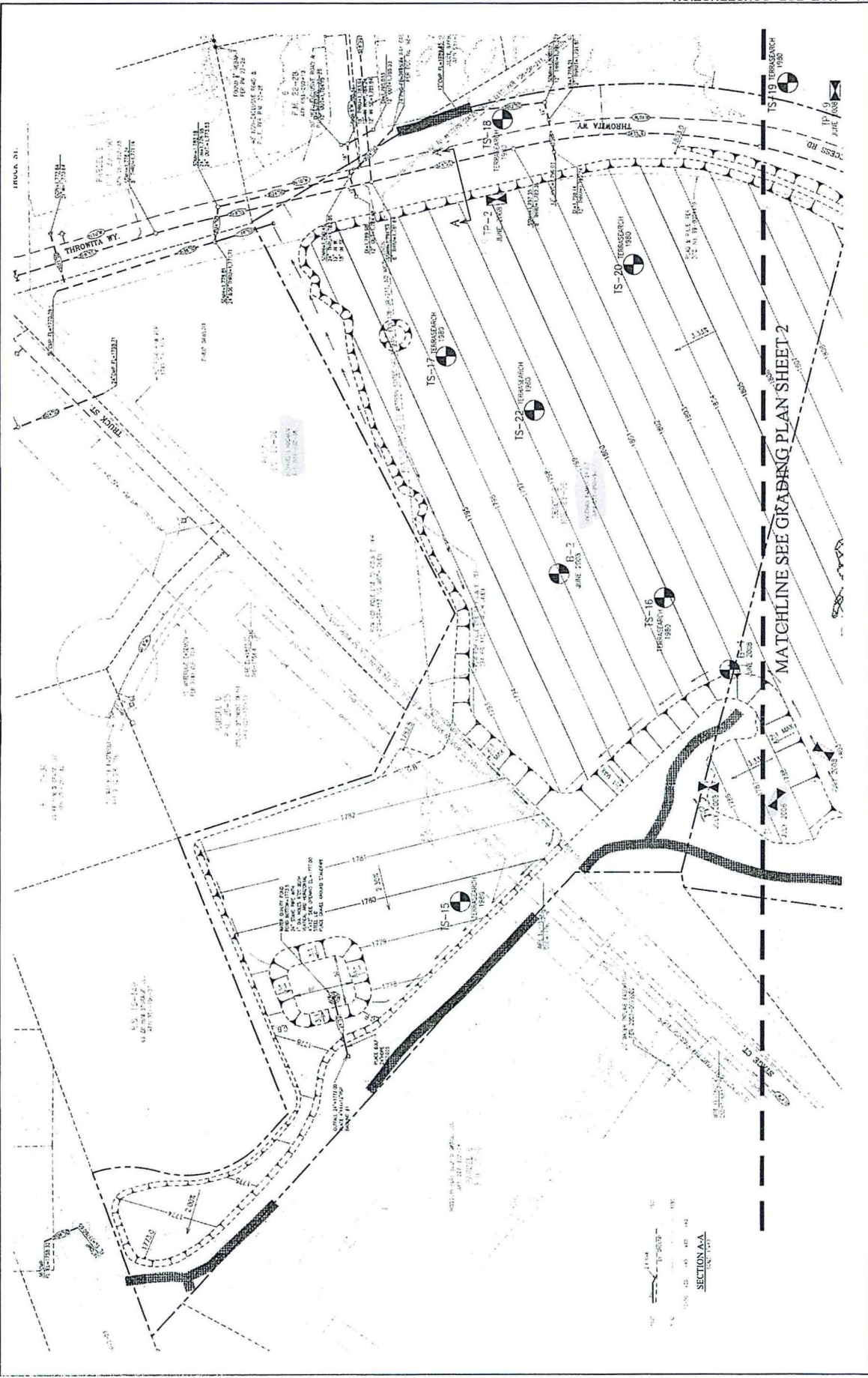
Ordered by:



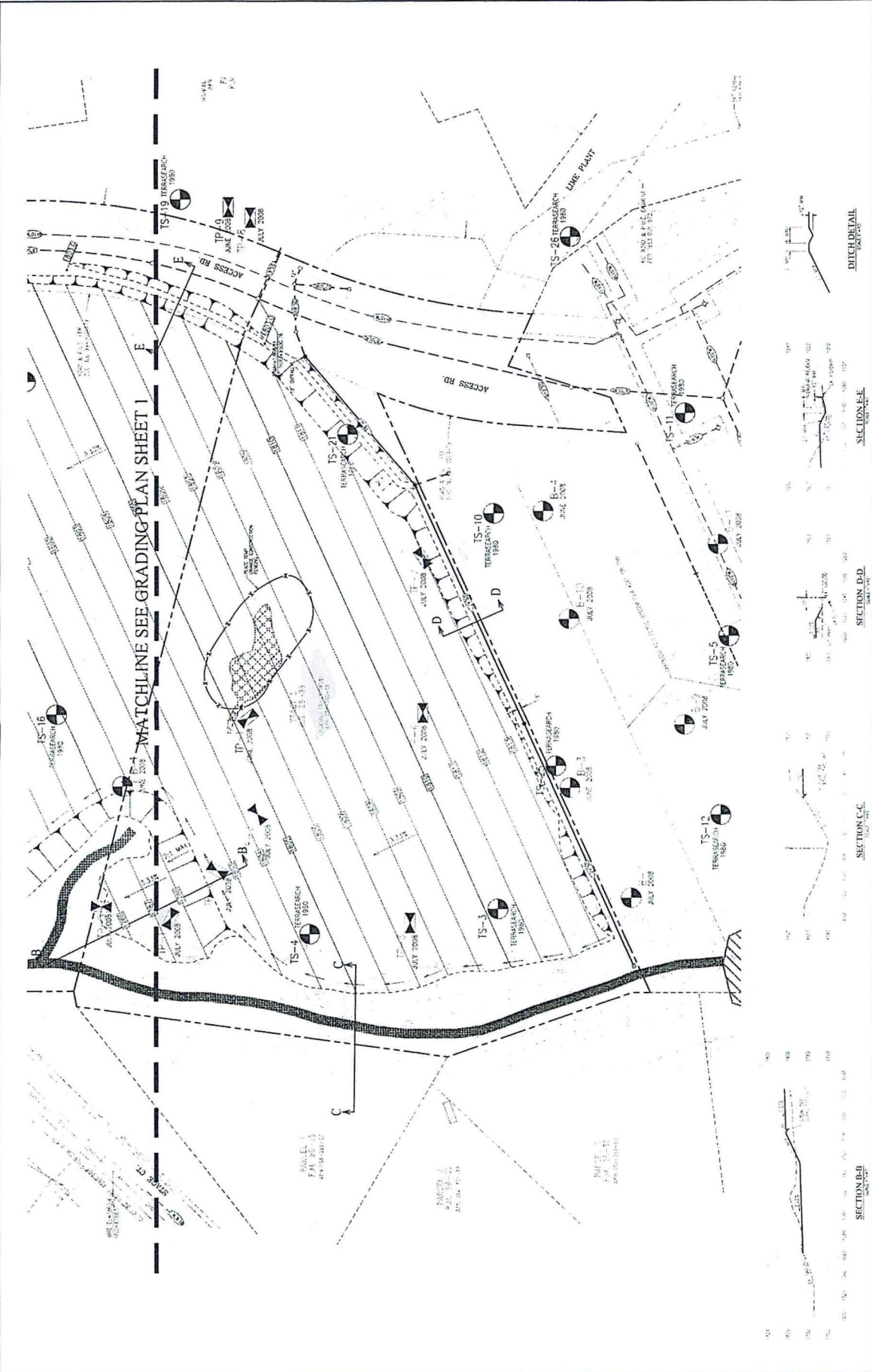
ANDREW ALTEVOGT
Assistant Executive Officer

2/19/16

(date)



NUMBER	DESCRIPTION	BY	DATE	REVISION	BLK	DATE	P.B. REF.	SCALE	DESIGNED BY	CHECKED BY	DATE	ctacivil		DATE	DATE	DATE	DATE
												PROJECT	DESCRIPTION				
<div style="display: flex; justify-content: space-between;"> <div style="width: 40%;"> <p>ctacivil Engineering & Surveying Civil Engineering - Land Surveying - Land Planning</p> <p>11414 BROADWAY, SUITE 200 ANN ARBOR, MI 48106</p> <p>DAVID R. CRANDALL DATE</p> </div> <div style="width: 40%; text-align: right;"> <p>LINDEMAN PROPERTIES GRADING PLAN SHEET 1</p> <p>3 6 OF</p> </div> </div>																	



<p>SECTION B, D DATE: 1/11/08</p>		<p>SECTION C, C DATE: 1/11/08</p>		<p>SECTION D, D DATE: 1/11/08</p>		<p>SECTION E, E DATE: 1/11/08</p>		<p>SECTION F, F DATE: 1/11/08</p>	
<p>DESIGNED BY: J. W. ...</p>		<p>CHECKED BY: J. W. ...</p>		<p>SCALE: 1" = 40'</p>		<p>DATE: 1/11/08</p>		<p>DATE: 1/11/08</p>	
<p>REVISION</p>		<p>DESCRIPTION</p>		<p>BY</p>		<p>DATE</p>		<p>DATE</p>	
<p>DRAWN BY: J. W. ...</p>		<p>PROJECT: LINDEMAN PROPERTIES</p>		<p>DATE: 1/11/08</p>		<p>DATE: 1/11/08</p>		<p>DATE: 1/11/08</p>	
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cta
Civil Engineering & Surveying
Land Surveying & Planning

LINDEMAN PROPERTIES
GRADING PLAN SHEET 2

SHEET 4
OF 6

To: EDC COB
Subject: Fwd: Fw: Comments on revised EIR for El Dorado Lime Kiln High pH sludge
Sent: 5/2/16, 12:48:38 PM PDT

was read on 5/2/16, 12:48:52 PM PDT

EDC COB <edc.cob@edcgov.us>
To: The BOSFOUR <bosfour@edcgov.us>

Mon, May 2, 2016 at 12:50 PM

Thanks, but I already got it and have provided copies and attached in Legistar. Kim

Thank you. Appropriate public comment provided for upcoming agenda items will be added to the corresponding file.

Office of the Clerk of the Board
El Dorado County
330 Fair Lane, Placerville, CA 95667
530-621-5390

[Quoted text hidden]

trails-first@att.net <trails-first@att.net>

Mon, May 2, 2016 at 3:20 PM

Reply-To: trails-first@att.net

To: "bosfour@edcgov.us" <bosfour@edcgov.us>

Cc: "jim.mitrisin@edcgov.us" <jim.mitrisin@edcgov.us>, "edc.cob@edcgov.us" <edc.cob@edcgov.us>

Hi Brenda: Please add this e-mail that I have received from Marie McCrink as a additional comment on this Agenda item apparently The Regional Water Board has not received a Notice of this proposed EIR and Marie McCrink who is a Supervisor at the California Water Board overseeing the Discharges and other issues related to this project that are a part of this proposed action.

In light of this New Information from the Regional Water Board, I hereby request that any action other than to table this item until the Regional Water Quality Board and potentially other Regulatory Agencies can be noticed and or provide additional comments.

Thank You
Steven Proe



----- Forwarded Message -----

From: "McCrink, Marie@Waterboards" <Marie.McCrink@waterboards.ca.gov>
To: "trails-first@att.net" <trails-first@att.net>
Sent: Monday, May 2, 2016 1:35 PM
Subject: RE: Comments on revised EIR for El Dorado Lime Kiln High pH sludge

Hi Steve,

Thank you for your email and voicemail.
I had not heard about EIR.
I will contact the county when I get back to office on Wednesday.

Sincerely,
Marie McCrink

From: trails-first@att.net [trails-first@att.net]
Sent: Monday, May 02, 2016 11:49 AM
To: McCrink, Marie@Waterboards
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----- Forwarded Message -----

From: "cherylblychester@aol.com" <cherylblychester@aol.com>

To: Peck.Ha@usace.army.mil; rditto@waterboards.ca.gov; Karen.Smith@cdph.ca.gov; carol.oz@wildlife.ca.gov; Marie.McCrink@waterboards.ca.gov; wampler.david@epa.gov; MarineNews@wildlife.ca.gov; edcwatchdog@hotmail.com; kristin.brinks@edcgov.us

Sent: Sunday, May 1, 2016 12:35 PM

Subject: Comments on revised EIR for El Dorado Lime Kiln High pH sludge

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Regards,

Cheryl Bly-Chester

<https://eldorado.legistar.com/LegislationDetail.aspx?ID=2701803&GUID=49B64F9E-A572-46C0-A331-6C7EF01FC6F0>