

## MEMORANDUM

---

**DATE:** January 4, 2006

**TO:** Scott Anderson, Director of Community Development, Town of Tiburon

**REGARDING:** Tiburon Glen Off-Site Tree Mitigation

**FROM:** Bob Berman, Nichols • Berman  
Melissa Denena, Live Oak Associates, Inc.

---

### MESSAGE:

As discussed in the *Tiburon Glen Second Addendum to the August 2003 Final Environmental Impact Report (Second Addendum)* the impact of the proposed three-lot residential project on oak-bay woodland (Impact 5.3-4 *Loss of Mixed Coast Live Oak-Bay Woodland*) would be a significant unavoidable impact. This was due to the fact that an off-site tree mitigation plan had not been identified. In addition, due to the oak-bay woodland impact two additional impacts (5.1-3 *Secondary Effects of Grading for Landslide Repair* and 5.3-10 *Cumulative Biologic Impacts*) were identified as significant unavoidable impacts.

The project applicant (Xanadu Property Holding, LLC) has now submitted an off-site tree mitigation plan. The off-site tree mitigation plan consists of:

- *Off-Site Tree Mitigation Plan Tiburon Glen Estates*, Sheet Number 8A, prepared by Donald L. Blayne & Associates, December 20, 2005.
- Letter to Mr. Scott Anderson, Community Development Director, Re: Off-Site Tree Mitigation Plan, Tiburon Glen Estates from Scott L. Hochstrasser, IPA, Inc., December 21, 2005.

As requested by Town staff, Nichols • Berman and Live Oak Associates, Inc. (the EIR biologists) have reviewed the proposed Tiburon Glen off-site tree mitigation plan. Live Oak Associates completed a site reconnaissance of the site in December 2005.

After reviewing the off-site tree mitigation plan Live Oak Associates, Inc. has come to the conclusion that impacts to the mixed coast live oak-bay woodland on the Tiburon Glen project site would be mitigated consistent with the requirements of Mitigation Measure 5.3-4. Therefore with the implementation of the off-site tree mitigation plan, impacts of the three-lot proposal to the Tiburon Glen woodland habitat (Impact 5.3-4) would be reduced to a less-than-significant level.

As discussed in the *Second Addendum*, the proposed three-lot project would require the removal of 168 trees. This number has been reduced from the original 517 trees proposed for removal in the eight-lot project. To offset the loss of the 168 on-site trees, the project applicant would need to mitigate at a 3:1 ratio, equaling 504 trees. The applicant's *On-Site Tree Mitigation Plan* proposes to plant 315 replacement trees within the project boundaries (reduced from 373 trees originally planned due to placement of trees near development and within the debris basin). However, this plan proposes to plant 268 of these trees on 12-foot centers, which is not sufficient spacing for coast live oaks.

Therefore, once the spacing is adjusted, fewer than 315 trees may be considered suitable mitigation plantings. However, assuming that 315 trees can be planted on-site, a total of 189 trees would need to be planted off-site to reduce impacts to the mixed coast live oak-bay woodland to a less-than-significant level.

The project applicant now proposes a location along Gilmartin Drive on Town-owned land to implement the off-site tree mitigation plan. The proposed area is overrun by broom, a highly invasive species. However, within the dense stand of broom, a few woody native species are present; coast live oaks and coyote brush. Also, an area proposed for mitigation planting appears to historically have supported a small patch of woodland habitat. It is assumed that this habitat was disturbed, removing the stand of mature trees, during the grading of Gilmartin Drive. Due to the historical evidence of established trees in this area of Tiburon and the presence of woody vegetation (indicating that the soils are deep enough to support additional plantings), the proposed off-site area is deemed suitable for the Tiburon Glen off-site tree mitigation plantings as long as the broom is controlled in the immediate vicinity of the plantings.

One critical aspect of the success of the off-site tree mitigation plan is to ensure that broom removal efforts will be successful. The project applicant has submitted a brief outline of what would be implemented in the future to ensure the continued control of the broom at the off-site mitigation location.<sup>1</sup> In short, the applicant would be required to have all broom in the vicinity of the newly planted trees pulled by hand or with an appropriate tool between January and May. Broom should be removed not only from the exact proposed planting locations, but also within a buffer area surrounding the newly planted trees. Following the broom removal, all new seedlings would be killed via "flaming" for a minimum of a five year period. All broom eradication work implemented by the applicant should be consistent with the guidelines provided in the California Invasive Plant Council's Weed Workers Handbook. Broom eradication is a very difficult task. Success results when an eradication program is implemented that involves intensive ongoing maintenance by knowledgeable individuals.

Another aspect of the success of the off-site tree mitigation plan is to ensure the availability of water supply. The applicant would be required to water the newly planted off-site replacement trees for a minimum of two years via drip irrigation. A waterline exists in the Gilmartin Drive right-of-way. This waterline, or another local water source, should be used as a source of the drip irrigation. Drip irrigation involves installing drip irrigation tubing to all planted trees, which allows deep percolation of water with little runoff or evaporation.

The off-site tree mitigation plan delineates a 1.8 acre area proposed for replanting and restoration. A total of 189 trees on 20 foot centers are proposed to be planted in this off-site location. As discussed above, a broom eradication plan has also been proposed for this area to ensure that the newly replanted trees are not overrun by the invasive broom.

By planting 315 trees on the Tiburon Glen site and 189 trees on Town-owned land off-site for a total of 504 replacement trees (3:1 ratio), the impact to the mixed coast live oak-bay woodland would be reduced to a less-than-significant level (Impact 5.3-4). By reducing Impact 5.3-4 to a less-than-significant level, Impact 5.1-3 (*Secondary Effects of Grading for Landslide Repair*) and Impact 5.3-10 (*Cumulative Biological Impacts*) would likewise be reduced to a less-than-significant level.

---

<sup>1</sup> Off-Site Tree Mitigation Plan Project Description and Detail, Broom Treatment Options, Letter to Mr. Scott Anderson, Community Development Director, Re: Off-Site Tree Mitigation Plan, Tiburon Glen Estates from Scott L. Hochstrasser, IPA, Inc., December 21, 2005.

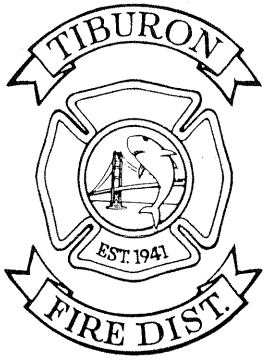
As required by Mitigation Measure 5.3-4(c) the project applicant would still be required to prepare a Mitigation and Monitoring Plan (MMP) for the off-site tree mitigation plan. The MMP shall include not only detailed measures of how to implement the broom eradication program and source of irrigation, but also similar measures as those required for the on-site tree replacement trees for ensuring the success of the off-site mitigation via monitoring. Monitoring measures outlined in Mitigation Measure 5.3-4(b) are as follows:

- The success of the off-site tree mitigation plan shall be monitored by a qualified restoration ecologist for a period not less than five years after initial implementation. Elements such as plant survival, percent cover, tree height and basal area, plant vigor / health, and natural recruitment / reproduction shall be evaluated during the annual monitoring of the replanted sites. The following criteria for monitoring the replanted trees shall be employed:
  - *Plant Survival* All trees installed shall have a 100 percent survival performance criterion during Year 1 of monitoring and an 80 percent survival performance criterion during Years 2 through 5 of monitoring period. All dead trees shall be replaced if survival falls below this performance criterion. The monitoring period shall start anew following replanting at any time, if survival falls below 80 percent. Survival results following the cessation of irrigation during the three-year establishment period would indicate whether plants' roots are sufficiently developed to support the plants under natural conditions.
  - *Percent Tree Cover* Percent cover would be used as an indicator of successful establishment of habitat. The final percent cover goal by Year 5 of monitoring is 15 percent tree cover of the area planted.
  - *Tree Height and Basal Area* The height of the replacement trees along with their basal area shall be measured during the annual monitoring. The area at the base of a tree provides a good measure of woodland biomass and tree diameter growth. By the end of the five year monitoring period, the trees should be at a predetermined height and have a predetermined basal area.
  - *Plant Vigor / Health* The overall plant vigor and health of the installed trees shall be monitored. Taken into consideration in the qualitative observation of vigor and health would be the factors of plant color, bud development, new growth, herbivory, drought stress, fungal/insect infestation, and physical damage. If a plant's foliage is abnormally sparse, then the health/vigor rating shall be lowered accordingly, even if the foliage present is healthy. Overall health and vigor shall be rated according to the following scale:
    - High -- 1-3 -- 67-100 percent healthy foliage
    - Medium -- 4-6 -- 34-66 percent healthy foliage
    - Low -- 7-9 -- 0-33 percent healthy foliage.
    - Dead -- 10
  - *Natural Reproduction / Recruitment* Natural reproduction/recruitment of woody plant species within the mitigation areas shall be monitored. Additional trees which had not previously been planted shall be counted and considered to be natural reproduction and recruitment. Any other native or non-native woody plants that become established shall also be counted and reported by species.

An additional monitoring measure should be added for the off-site mitigation setting a threshold of broom allowance. For instance, anytime a stand of broom is observed reestablishing within the mitigation area, a standard approach for eradicating the broom shall be implemented. If eradication is not successful, the monitoring will start anew until the broom has been successfully dealt with at the off-site mitigation location. If the broom becomes uncontrollable and reestablishes at its current density, the applicant will be required to plant additional trees within the unplanted "potential additional restoration areas" identified on the off-site tree mitigation plan<sup>2</sup> and monitoring will start anew at those locations.

---

<sup>2</sup> *Off-Site Tree Mitigation Plan Tiburon Glen Estates*, Sheet Number 8A, prepared by Donald L. Blayney & Associates, December 20, 2005.

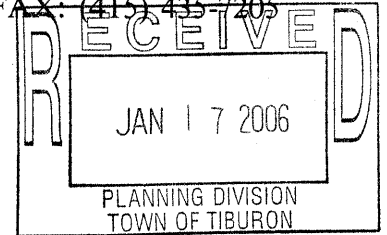


RICHARD PEARCE, FIRE CHIEF

## TIBURON FIRE PROTECTION DISTRICT

1679 TIBURON BOULEVARD, TIBURON, CALIFORNIA 94920  
TELEPHONE: (415) 435-7200

FAX: (415) 435-7205



**TO: TIBURON PLANNING DEPARTMENT**

**DATE: Jan. 13, 2006**

**FROM:** Ron Barney, Fire Marshal *R.E.B.*

**RE:** Tiburon Glen Estates off site tree mitigation plan

I have reviewed the Tiburon Glen Estates off site tree mitigation plan proposed by Scott Hochstrasser. The Tiburon Fire District supports this concept. This idea has the potential to reduce two areas of fire hazard with one mitigation. It could stop the requirement for tree replacements to occur in areas that are already have too many trees with competing canopies, and remove broom from an area infected with this invasive species.

I have some concerns regarding the practice of "flaming", however, I believe this practice may occur under some guidelines regarding the time of year and weather conditions that are conducive to this type of operation.

I think it may be advantageous to rearrange the areas set for eradication and planting. The area shapes designated on the proposal would make it harder for future areas to be cleared of broom without exposing the eradicated areas to more seeds. This would occur as the initial clearing of future broom areas had to be transported through the areas already cleared. The long narrow areas depicted by the proposal also expose the maximum amount of border area between the eradicated areas and those still invaded by broom. This would facilitate the reintroduction of the invasive broom into the reclaimed areas. I would suggest that areas designated for clearing begin at an edge of an area invaded by the broom and proceed in blocks, maximizing the area cleared while minimizing the border between the cleared and invaded areas.

Thank you for the opportunity to review the plans.

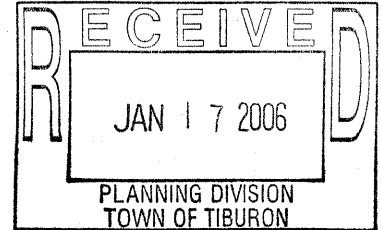
cc: file

EXHIBIT NO. 6

**ROBERT and EMILY HELLER**  
90 Gilmartin Drive, Tiburon, CA 94920  
Tel: 415-435-5437 – Mobile: 415-652-3456  
Fax: 415-435-2054 – HRHeller@Comcast.net

January 17, 2006

The Planning Commission  
Town of Tiburon  
1505 Tiburon Blvd.  
Tiburon, CA 94920



**SUBJECT: Xanadu Property Holdings Application**  
(Agenda Item January 11, 2006; Continued to January 25, 2006)

My wife and I have resided since May 1993 at 90 Gilmartin Drive and we would like to ask for a postponement of any consideration and a final decision regarding the above named application by Xanadu Properties. We are particularly concerned about the proposal to denude the hillside directly above our property as it will create an imminent danger of mudslides that will affect our property and potentially our lives.

Our property is located directly below the open space parcels on Gilmartin Drive, where the applicants propose to remove French broom and to re-plant the area with coast live oak trees. Such an action will present an imminent danger to our own property – as well as that of our neighbors -- by removing the current ground cover and subjecting our properties to severe water run-off and potential mudslides. Several points are worth noting:

1. The proposed clearing and removal of groundcover along the town-owned stretch of Gilmartin Drive directly above our residence involves steep and treacherous mountain terrain subject to mudslides. Such mudslides would pose an imminent danger to our lives and property. The area where the ground cover is to be removed is very steep, with Gilmartin Drive itself ascending at a grade of approximately 20 percent and the drop-off to our property reaching 45 degrees and more. To remove the existing groundcover without adequate replanting and the establishment of drainage ditches would create an immediate hazard and direct liability to the Town of Tiburon as well as Xanadu Properties if such mudslides should occur due to the project.
2. It is clear that the area is subject to severe mudslides as indicated by the major mudslide which occurred only a few hundred feet directly south of our property above the residence located at 10 Via Paraiso East. This location has topography very similar to the topography above our own property. However, no French broom or other groundcover existed and consequently, the entire hillside

EXHIBIT NO. 7

collapsed during one of the seasonal rainstorm a few years ago. The house could be rescued only with enormous effort and expense – a fate that we wish to avoid.

3. If the reduction of fire danger is the key motivating force for the French broom removal, it seems somewhat counterproductive to remove the broom on the land that is furthest removed from our houses. Instead, the planning map shows that you intend to leave the broom in place near our houses, where it presents the greatest fire danger to our house and that of our neighbors. Would it not be more rational to remove the broom from the entire hillside between the upper part of Gilmartin and our houses and to restore the entire hillside with appropriate replanting and drainage ditches?

There are several alternative courses of action that I would urge the Planning Commission and the Town of Tiburon to consider:

A. There is an abandoned fire road to the north-west of 100 Gilmartin, which leads from the sharp curve in Gilmartin Drive to the 'Hippie-Tree' located on open space overlooking the Bay. When we moved into our current residence, this fire road was well maintained and used by numerous hikers to access the open space. In the years that followed, rain started to erode the road with ravines up to two feet deep. As it became too treacherous to walk the road, French broom and other invasive plants took over, making the fire road totally impassable. A valuable resource to the community was lost.

Why not concentrate the French broom removal effort on this fire road, where the effort would lead to the restoration of a valuable resource to the community and actually mitigate a current danger and liability to the Town while avoiding the creation of a new significant monetary liability to the Town and a significant new danger to our property.

B. If you, however, insist on removing the groundcover directly above our and our neighbor's residences, I would like to urge you to take appropriate measures to mitigate the danger of a major mudslide affecting our property. At a minimum, these mitigation measures should include: (a) the establishment of a drainage ditch to catch the run-off water and divert it away from our property and that of our neighbors; (b) immediately cover the entire French broom removal area with jute to avoid the establishment of new ravines; (c) immediately plant low native ground-cover, such as Coral Bells, to minimize the chance of mud slides; (d) I would also urge you to consider instead of the proposed oak trees, which mature in 30 to 40 years according to your own statements, a tree species that matures somewhat more quickly. Finally, (f) you should establish an appropriate fund to maintain the property and to allow for the re-planting of trees that die prematurely. This danger should not be neglected as the fairly thin topsoil layer subject to slides sits on solid bedrock that will prevent the establishment of truly deep tree roots. Hence, the oak trees may well die shortly after planting. I trust that you have consulted with an experienced arborist about this possibility. Just a few months ago, about 80 to 90 percent of all the trees planted along lower Gilmartin Drive died only a few weeks after they had been planted and had to be replaced. I would not want the same fate to afflict all of the 190 trees that the Town wants to plant on upper Gilmartin Drive.

I was ready to address these concerns and issues at the scheduled hearing on the Xanadu Properties case on January 11, 2006, when the hearing was originally scheduled. Unfortunately, I will not be able to attend the rescheduled hearing on January 25, 2006 because I will have to be out of town on business. I would herewith like to request a continuance of the Hearing to a time when I will be able to attend and express my concerns.

Cordially yours,

Emily Heller

Robert Heller

designated "protected trees", defining critical management guidelines necessary to maintain healthy woodlands, and methods to encourage natural regeneration in woodland habitats.

### **3.4 OPEN SPACE MANAGEMENT**

The Town of Tiburon owns and manages approximately 270 acres of open space. These open spaces are depicted on Diagram 3.4-1.

Open spaces, like other property, requires management to maintain them as healthy and valuable. The Town's Public Works Department has primary responsibility for maintaining the Town's open spaces, including trails and fire roads.

#### **Open Space Management Policies**

- OSC-41:** The Town shall encourage conservation and education uses of its public open space lands.
- OSC-42:** The Town may authorize or provide conservation and education facilities, including nature trails, interpretive exhibits, day camps, nature study areas and other related facilities in areas where the impacts on the natural environment will be minimal.
- OSC-43:** The Town shall encourage and seek agreements with other governmental jurisdictions such as County, State, Federal and other agencies for funding, acquisition, maintenance and use of open space areas.
- OSC-44:** The Town shall encourage and promote cooperation and participation of private groups, organizations, and individuals in the planning, operation and preservation of open space lands as deemed necessary.
- OSC-45:** The Town shall, where desirable, coordinate the use of its open space lands with other public and quasi-public lands that are contiguous or otherwise inter-related to Town open space.
- OSC-46:** The Town may engage in or authorize landscape restoration and/or enhancement programs where the natural landscape has

been altered or degraded and when funding and resources allow on its open space land.

### Implementing Program for Prime Open Space Management

**OSC-g:** The Town shall develop and adopt an Open Space management program that identifies maintenance projects and funding sources.

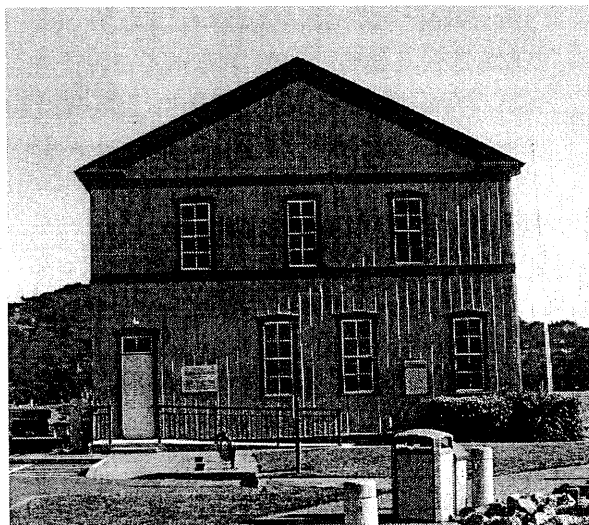
## 3.5 RESOURCE CONSERVATION

### Historical & Cultural Resource Policies

As identified earlier in this Element, the Town has several historic resources that are formally listed by the federal government, state government, and/or the Town.

**OSC-47:** The Town shall protect significant geological, ecological, archaeological and paleontological resources and historic sites.

**OSC-48:** The Town shall strive to preserve and protect structures and properties which have historical, cultural, aesthetic or other special character or interest to the Town.



*The Donahue Building, operated by the Belvedere – Tiburon Landmarks Society, is both a Tiburon Historical Landmark and is also listed on the National Register of Historic Places.*

### Water Supply Policies

Water is supplied to the Planning Area by the Marin Municipal Water District (MMWD). MMWD serves the urbanized part of Marin County, excluding Novato, and serves approximately 185,000 people.

As its primary source of water, MMWD maintains seven reservoirs within Marin County, ranging in capacity from 32,985 acre-feet (Kent Lake Reservoir) to 350 acre-feet (Lagunitas Lake Reservoir), with a total storage capacity of 79,566 acre-feet. The average yearly runoff into MMWD's

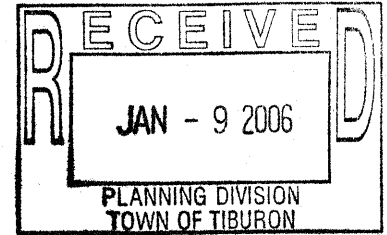
**Richard B. Collins**

660 Tiburon Boulevard  
Tiburon, California 94920  
Telephone 415 789 5205; Fax 415 789 5206

January 5, 2006

VIA FACSIMILE TO: (415) 435-2438

Mr. Jim Fraser  
Vice Chairman, Planning Commission  
Tiburon Town Hall  
Town of Tiburon  
1505 Tiburon Blvd.  
Tiburon, Ca 94929



Re: File #303403: Tiburon Glen Project recommendation to the Town Council regarding a Precise Development Plan (PD#22) to create three (3) building sites on a 26.03 acre parcel; Review of Second Addendum to Certified EIR; 3700 block of Paradise Drive near Norman Way; Xanadu Property Holdings, Inc., Owners; Assessor's Parcel 39-241-01.

Dear Jim:

In connection with the continued public hearing for the subject application set for January 11, 2006, it is my recommendation that if the Planning Commission elects to approve the project in the form recommended by the Staff, that the proposed changes to the draft Resolution discussed below also be made by the Planning Commission.

In order to ensure consistency and compatibility with General Plan Land Use Element Goal LU-I and to reduce the visual impacts of the project, I recommend a change to Condition No. 4 of Section 4 of the draft Resolution by adding the following language:

"It is understood that the square footage of each dwelling unit is a maximum allowable square footage, and the Town may, in its reasonable discretion, approve a lesser amount of square footage for the dwelling units on any or all of the lots in order to ensure that the house sizes are consistent and compatible with surrounding neighborhoods in compliance with and as set forth in General Plan Land Use Element Goal LU-I."

It is also my belief that the potential for visual impacts of the project could be further reduced by lowering the maximum allowable height of the proposed residences from 30 feet to 25 feet. This will provide meaningful visual mitigation and serve to increase the project's consistency with General Plan Land Use Element Goal LU-I and General Plan Land Use Element Policies LU-12 and LU-13.

EXHIBIT NO. 9

Mr. Jim Fraser  
Vice Chairman, Planning Commission  
January 5, 2006  
Page 2

In that regard, I recommend that the second (last) sentence of Condition No. 7 of Section 4 the draft Resolution be changed to the following:

“Dwelling units shall not exceed twenty-five (25) feet in height from grade.”

The General Plan Land Use Element Goal and Policies that I have referred to in this letter are recited below.

Land Use Goal LU-I: To encourage intensity of development, density, and house sizes/architectural styles that are consistent and compatible with surrounding neighborhoods.

Land Use Policy LU-12: The Town shall encourage projects that enhance its character and image through the development and design review process. Monotony in design, and massive or inordinately large or bulky structures and site coverage that overwhelm or that are inconsistent with the surrounding area shall be avoided.

Land Use Policy LU-13: Neighborhood character, which is defined by the predominant architectural styles, type of buildings, building heights, mass, setbacks, landscaping, and natural characteristics, shall be of material consideration and preserved in all construction projects, including remodels and additions, to the maximum extent feasible.

Thank you for considering the suggestions contained in this letter.

Sincerely,



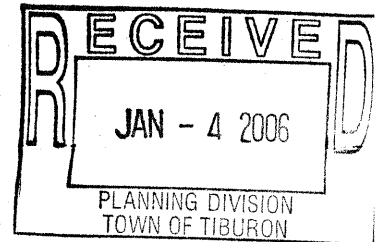
RICHARD B. COLLINS  
Planning Commissioner

cc: John Kunzweiler, Planning Commission Chairman  
Al Aguirre, Planning Commissioner  
Scott Anderson, Director of Community Development

COUNTY OF MARIN  
DEPARTMENT OF PARKS AND OPEN SPACE  
3501 CIVIC CENTER DRIVE, SUITE 415, SAN RAFAEL, CA 94903  
415/499-6387 - FAX 415/ 499-3795

January 3, 2006

Scott Anderson  
Community Development Agency  
Tiburon Town Hall  
1505 Tiburon Boulevard  
Tiburon, CA 94920



RE: Tiburon Glen Precise Development Plan

Dear Mr. Anderson:

Thank you for the opportunity to comment on the above-referenced project. The applicant is proposing a three-lot land division of a parcel on the Tiburon Peninsula northwest of the Old Saint Hillary's Open Space Preserve. The District previously commented (letter dated October 25, 2004) on the final EIR addendum for this project and identified the District's interest in acquiring a trail easement across the property consistent with the trails element of the Countywide Plan. District staff reiterates its request for the applicant to consider a dedication of trail easement to the District as part of the proposed project. The District also notes that the project is located within the County's Ridge and Upland Greenbelt and recommends that the planning commission consider the protection of the ridgeline using open space easements or other similar mechanisms.

If you have any questions, you can call me at (415) 499-3745.

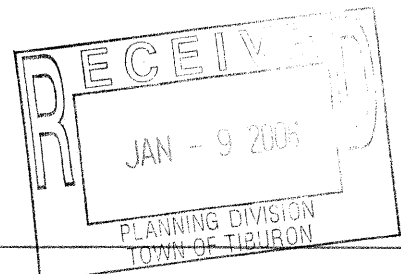
Sincerely

  
James R. Raives  
Senior Open Space Planner

EXHIBIT NO. 10



# MARIN MUNICIPAL WATER DISTRICT



220 Nellen Avenue Corte Madera CA 94925-1169  
www.marinwater.org

December 29, 2005  
File No. 244.1  
Map No. N21-08

Scott Anderson  
Town of Tiburon  
1505 Tiburon Bl  
Tiburon CA 94920

**RE: WATER AVAILABILITY**—Tiburon Glen  
Assessor's Parcel No.: 039-241-01  
Location: Paradise Dr., Tiburon

Dear Mr. Anderson:

The above referenced parcel is not currently being served and no water has been allocated to this property. This parcel does not meet the conditions for service as set forth by the District which state in part: "the property must be fronted by a water main; the structure must be within 125 feet of the water main." Under these conditions, water service to this property will require a pipeline extension and the upgrade of the District's existing facilities. The applicant must enter a pipeline extension agreement for the installation of the necessary facilities and said agreement must be approved by the District's Board of Directors. All costs associated with a pipeline extension are borne by the applicant.

Upon completion and acceptance of these facilities, this property will be eligible for water service upon request and fulfillment of the requirements listed below.

1. Complete a Standard Water Service Application.
2. Submit a copy of the building permit.
3. Pay appropriate fees and charges.
4. Complete the structure's foundation within 120 days of the date of application.
5. Comply with the District's rules and regulations in effect at the time service is requested.
6. All landscape and irrigation plans must be designed in accordance with the most current District landscape Requirements (currently from Ordinance #385). Prior to providing water service for new landscape areas, or improved or modified landscape areas, the District must review and approve the project's working drawings for planting and irrigation systems. Any questions regarding the District's current water conservation and landscape Ordinance should be directed to Charlene Burgi at (415) 945-1525.
7. Comply with the backflow prevention requirements, if upon the District's review backflow protection is warranted, including installation, testing and maintenance. Questions regarding backflow requirements should be directed to the Backflow Prevention Program Coordinator at (415) 945-1559.

If you have any questions regarding this matter, please contact me at (415) 945-1531.

Very truly yours,

Joseph Eischens  
Engineering Technician  
JE:dh

**EXHIBIT NO. 11**