



MARK PESTRELLA, Director

**COUNTY OF LOS ANGELES  
DEPARTMENT OF PUBLIC WORKS**

*"To Enrich Lives Through Effective and Caring Service"*

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IN REPLY PLEASE  
REFER TO FILE

November 07, 2017

The Honorable Board of Supervisors  
County of Los Angeles  
383 Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012

Dear Supervisors:

**CONSTRUCTION CONTRACT  
WATER RESOURCES CORE SERVICE AREA  
CERTIFICATION OF RECIRCULATED PORTIONS OF THE FINAL  
ENVIRONMENTAL IMPACT REPORT, ADOPT REVISIONS TO THE MITIGATION  
MONITORING AND REPORTING PROGRAM, AND REVISED ENVIRONMENTAL FINDINGS,  
CONFIRM STATEMENT OF OVERRIDING CONSIDERATIONS AND  
ADOPT THE PLANS, AND DELEGATE AUTHORITY TO ADVERTISE AND AWARD  
DEVIL'S GATE DAM AND RESERVOIR SEDIMENT REMOVAL PROJECT  
IN THE CITIES OF IRWINDALE AND PASADENA  
(SUPERVISORIAL DISTRICTS 1 AND 5)  
(3 VOTES)**

**SUBJECT**

This action is to void and set aside those prior portions of the Final Environmental Impact Report for the Devil's Gate Dam and Reservoir Sediment Removal Project (Approved Project) in the Cities of Irwindale and Pasadena, certified by the Board on November 12, 2014, which have been revised by the new Recirculated Portions of the Final Environmental Impact Report; certify the Recirculated Portions of the Final Environmental Impact Report and adopt the revisions to the previously adopted Mitigation Monitoring and Reporting Program; find the following recommended actions are within the scope of the previously certified Final Environmental Impact Report together with the Recirculated Portions of the Final Environmental Impact Report; adopt the revisions to the previously adopted Environmental Findings of Fact as to the currently recommended actions and find that the recommended actions are within the scope of the previously adopted Statement of Overriding Considerations; delegate authority to the Chief Engineer of the Los Angeles County Flood Control District or his designee to execute an agreement with the California Department of Fish and Wildlife to provide for \$14,000,000 in financial assurances for compensatory mitigation; adopt the plans and

specifications; delegate authority to the Chief Engineer of the Los Angeles County Flood Control District or his designee to advertise for bids, award and execute a construction contract for the clearing of the reservoir, excavation, transportation, and disposal of sediment and construction of access roads and other improvements with the responsible contractor with the lowest responsive bid; and delegate certain responsibilities to the Chief Engineer of the Los Angeles County Flood Control District or his designee to carry out the Approved Project.

**IT IS RECOMMENDED THAT THE BOARD ACTING AS THE GOVERNING BODY OF THE LOS ANGELES COUNTY FLOOD CONTROL DISTRICT**

1. Void and set aside those portions of the Final Environmental Impact Report, certified November 12, 2014, for the Devil's Gate Reservoir Sediment Removal and Management Project, which have been revised by the new Recirculated Portions of the Final Environmental Impact Report for the Devil's Gate Reservoir Sediment Removal and Management Project as instructed by the Los Angeles County Superior Court in its ruling in Arroyo Seco Foundation v. County of Los Angeles, Los Angeles County Superior Court Case No. 152771.
2. Certify that the Recirculated Portions of the Final Environmental Impact Report for the Devil's Gate Reservoir Sediment Removal and Management Project have been completed in compliance with the California Environmental Quality Act and reflect the independent judgment and analysis of the Los Angeles County Flood Control District; find that the Board has reviewed and considered the information contained in the Recirculated Portions of the Final Environmental Impact Report together with the previously certified Final Environmental Impact Report; adopt the revisions to the previously adopted Mitigation Monitoring and Reporting Program for the Approved Project, finding that the amended Mitigation Monitoring and Reporting Program for the Approved Project is adequately designed to ensure compliance with the mitigation measures during implementation of the Approved Project.
3. Find the recommended actions below, which implement the project, are within the scope of the Final Environmental Impact Report, certified November 12, 2014, together with the Recirculated Portions of the Final Environmental Impact Report, which replace the voided sections and that there have been no substantial changes to the Approved Project or the circumstances under which it will be undertaken. Find that the enclosed revisions to the Mitigation Monitoring and Reporting Program for the Approved Project are adequately designed to ensure compliance with the mitigation measures during implementation of the currently recommended actions below, adopt the revisions to the previously adopted Mitigation Monitoring and Reporting Program; determine that the significant adverse effects of the recommended actions have either been reduced to an acceptable level or are outweighed by the specific considerations of the Approved Project, as outlined in the revisions to the previously adopted Environmental Findings of Fact and in the previously adopted Statement of Overriding Considerations, which remains unchanged from adoption on November 12, 2014; adopt the Revisions to the Findings of Fact, enclosed herein, and confirm the previously adopted Statement of Overriding Considerations, incorporated by reference and enclosed herein.
4. Delegate to the Chief Engineer of the Los Angeles County Flood Control District or his designee the authority to execute an agreement with the California Department of Fish and Wildlife to provide \$14,000,000 in financial assurances for compensatory mitigation as a result of this Approved Project.
5. Adopt the plans and specifications that are on file in the Construction Division of the Department of Public Works for Project ID No. WRDM000037 – Devil's Gate Dam and Reservoir Sediment Removal Project with an estimated construction contract cost between \$75,000,000 and \$100,000,000 and make a finding that the crash cushion type, REACT 350 II, manufactured by

Trinity Highway Products, is the only available crash cushion that meets the necessary performance requirements.

6. Delegate to the Chief Engineer of the Los Angeles County Flood Control District or his designee the authority to instruct the Executive Officer of the Board to advertise the Approved Project for bids to be received and opened on the date determined by the Chief Engineer of the Los Angeles County Flood Control District or his designee, in accordance with the instruction sheet for publishing legal advertisements. This instruction will only occur when the Chief Engineer or his designee has determined that all required permits have been issued or that all required permits will be issued in sufficient time prior to award of the construction contract.

7. Authorize the Chief Engineer of the Los Angeles County Flood Control District or his designee to determine whether the bid of the apparent responsible contractor with the lowest apparent responsive bid is, in fact, responsive and, if not responsive, to determine which apparent responsible contractor submitted the lowest responsive bid.

8. Authorize the Chief Engineer of the Los Angeles County Flood Control District or his designee to award and execute a construction contract for the clearing of the reservoir; excavation, transportation, and disposal of sediment, construction of access roads; and other improvements with the responsible contractor with the lowest responsive bid within the estimated cost range.

9. Authorize the Chief Engineer of the Los Angeles County Flood Control District or his designee to award and execute a construction contract if the lowest responsive bid exceeds the estimated cost range by no more than 20 percent and if additional and appropriate funds have been identified.

10. Delegate to the Chief Engineer of the Los Angeles County Flood Control District or his designee the following authority in connection with this contract: 1) extend the date and time for the receipt of bids consistent with the requirements of State Public Contract Code, Section 4104.5; 2) allow substitution of subcontractors and relief of bidders upon demonstration of the grounds set forth in State Public Contract Code, Sections 4100 et seq. and 5100 et seq., respectively; 3) approve and execute change orders within the same monetary limits delegated to the Director of Public Works under Section 2.18.050 of the Los Angeles County Code relative to the construction of County buildings, so long as such orders fall within the scope of the Final Environmental Impact Report together with the recirculated portions; 4) accept the Approved Project upon its final completion; and 5) release retention money withheld consistent with the requirements of State Public Contract Code, Sections 7107 and 9203.

### **PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION**

The purpose of the recommended actions is to void and set aside those prior portions of the previously certified Final Environmental Impact Report (FEIR), which have been revised by the new Recirculated Portions of the FEIR as instructed by the Los Angeles County Superior Court; certify the Final Recirculated Portions of the FEIR; adopt the revisions to the previously adopted Mitigation Monitoring and Reporting Program (MMRP); adopt the revisions to the Environmental Findings of Fact, confirm the previously approved Statement of Overriding Considerations, and approve the currently recommended actions.

The Devil's Gate Reservoir Sediment Removal and Management Project (Approved Project) consists of the clearing and grubbing of trees and vegetation; construction and removal of a median left-turn pocket; construction of concrete and asphalt concrete pavement, reinforced concrete and

polyethylene pipe, drainage and retaining structures; excavation, transportation, disposal, and placement of sediment; and the performance of other appurtenant work under Project ID No. WRDM000037 – Devil's Gate Dam and Reservoir Sediment Removal Project.

The Station Fire and subsequent storms have deposited 1.3 million cubic yards (MCY) of sediment in Devil's Gate Reservoir. The reduced capacity increases flood risk to 650 downstream parcels, including 447 structures, in the Cities of Pasadena, South Pasadena, and Los Angeles, as well as portions of the 110 Freeway from Orange Grove Avenue to the I-5 freeway.

On November 12, 2014, the Board certified the Final Environmental Impact Report (FEIR), and approved the recommended Approved Project. The Approved Project will remove vegetation and 2.4 MCY of sediment from 69 acres within the reservoir over a period of 3 to 5 years. After completion, approximately 41 acres will be reserved for permanent maintenance activities where sediment will be removed on an annual basis. The Approved Project requires 103 acres of mitigation, with approximately 77 acres occurring onsite and approximately 26 acres offsite. On December 11, 2014, the Arroyo Seco Foundation and the Pasadena Audubon Society (collectively "Petitioners") filed an action, seeking a Writ of Mandate to stop the project, to decertify the FEIR, and to direct the District to prepare a new Environmental Impact Report.

On April 19, 2017, the Superior Court of the County of Los Angeles entered a judgment that rejected most of the Petitioners' requests, left the previous project approval intact, and found that the size and scope of the project was appropriate. However, the Court's judgment directed the District to revise and recirculate certain limited portions of the FEIR for review and comment and for consideration of your Board. As a result of the judgment, limited portions of the Devil's Gate Reservoir Sediment Removal and Management Project FEIR were recirculated for an extended 55-day public review period from July 24 to September 18, 2017. As directed by the Court, the Los Angeles County Flood Control District has revised and recirculated only those sections of the FEIR and Mitigation Monitoring and Reporting Program (MMRP) for the Approved Project, for Alternative 3, Configuration D (Approved Project), and for Alternative 5 (Haul Route Alternative) related to: 1) the 1:1 mitigation ratios in Mitigation Measures BIO-6, -7, and -8; 2) the imposition of Mitigation Measures BIO-1 through 8 on the proposed Devil's Gate Water Conservation Project, should such a project go forward, to reduce potential cumulative impacts for this project; and 3) the requirement, in Mitigation Measure AQ-1, that sediment removal dump trucks meet Environmental Protection Agency's emission standards for Model Year 2010 or later, rather than Model Year 2007, as previously stated.

The purpose of the recommended actions is for the Board, acting as the Governing Body of the Los Angeles County Flood Control District, to void and set aside those prior portions of the FEIR which have been revised by the new Recirculated Portions of the FEIR as instructed by the Los Angeles County Superior Court; certify the Recirculated Portions of the FEIR and adopt the revisions to the previously adopted MMRP; adopt the revisions to the Environmental Findings of Fact as to the currently recommended actions; confirm the previously adopted Statement of Overriding Considerations adopted by the Board on November 12, 2014, which remains unchanged; delegate authority to the Chief Engineer of the District or his designee to execute an agreement with the California Department of Fish and Wildlife to provide for \$14,000,000 in financial assurances to provide for the completion of compensatory mitigation as required by Streambed Alteration Agreement (No. 1600-2015-0263-R5) and as a result of impacts from this Approved Project; adopt the plans and specifications; delegate authority to the Chief Engineer or his designee to advertise for bids, award and execute a construction contract for the clearing of the reservoir, excavation, transportation, and disposal of sediment and construction of access roads and other improvements with the responsible contractor with the lowest responsive bid; and delegate authority to the Chief Engineer or his designee to carry out the Approved Project.

## **Implementation of Strategic Plan Goals**

The County Strategic Plan directs the provisions of Strategy III.3.3, Pursue Operational Effectiveness, Fiscal Responsibility, and Accountability and Objective III.3.2, Manage and Maximize County Assets. The recommended action supports ongoing efforts to manage and improve public infrastructure assets.

## **FISCAL IMPACT/FINANCING**

There will be no impact to the County General Fund.

The estimated construction contract cost to complete the Approved Project is in the range of \$75,000,000 to \$100,000,000. The total Approved Project cost is estimated to be \$135,000,000. This Approved Project is to be completed over a period of 5 years. It is anticipated the work will start in the fall of 2018 and be completed in the winter of 2023. Funding for the project will be made available through the Flood Control District Fund annual budget process. In addition to the construction contract costs, the total project cost includes the preparation of plans and specifications, consultant services, survey, environmental clearance, right of-way and utility clearances, materials testing, inspection, contract administration, change order contingency, and other County services.

## **FACTS AND PROVISIONS/LEGAL REQUIREMENTS**

Devil's Gate Reservoir is located in the upper portion of the Arroyo Seco Watershed in the City of Pasadena. The City of Pasadena is the underlying land owner of the Devil's Gate Reservoir and the District has a flood control and water conservation easement.

As a result of sediment inflows following the 2009 Station Fire, Devil's Gate Reservoir no longer has the capacity to safely contain another major debris event, and the outlet works are at risk of becoming clogged and inoperable.

On November 12, 2014, Agenda Item 37, the Board certified the FEIR, approved the project, Alternative 3, Configuration D, Option 2, in conjunction with Alternative 5 as the recommended alternative, and authorized the District to develop plans and specifications for the project that will remove sediment from Devil's Gate Reservoir to restore capacity and establish reservoir management to maintain the flood control capacity of the reservoir while allowing for habitat and vegetation to remain in specified areas of the reservoir.

On December 11, 2014, the Arroyo Seco Foundation and the Pasadena Audubon Society filed a Petition for Writ of Mandate challenging the adequacy of the FEIR. While Petitioners raised many claims at the conclusion of the litigation on April 19, 2017, Judge James C. Chalfant of the Superior Court of the County of Los Angeles found that the FEIR complied with the California Environmental Quality Act (CEQA) on all, but three narrow grounds. Accordingly, the Court denied Petitioners' request that the project approvals be set aside and instead ordered the County and the District to only set aside and recirculate limited portions of the FEIR. Specifically, the Court ordered the District to:

- a. Void and set aside the November 12, 2014, certification of the portions of the FEIR that are necessary to bring the District's actions into compliance with CEQA.
- b. Take action to remedy the inadequacies found by the Court in the FEIR as described in the

Decision.

- c. Revise and recirculate all necessary portions of the FEIR and MMRP for a 45-day public comment period.
- d. Place the Recirculated Portions of the FEIR and any amended portion of the MMRP on the publicly noticed agenda of the Board for hearing and public comment.
- e. Suspend any and all project activities unless and until the District has taken the necessary corrective actions to comply with CEQA and the Writ.
- f. Ensure that the entire Environmental Impact Report has been completed in compliance with CEQA and the CEQA Guidelines prior to its recertification.
- g. Comply with the provisions of CEQA and the CEQA Guidelines in all other respects.

Under the Public Resources Code, Section 21168.9(b), the Court will retain jurisdiction over the District's proceedings through a return to the Writ until the Court determines that the District has complied with CEQA and the Writ.

The California Department of Fish and Wildlife, under its authority over substantial changes to any river, stream or lake and the California Endangered Species Act has established through their Streambed Alteration Agreement (No. 1600-2015-0263-R5), that the District provide a fund designation and credit until required compensatory mitigation is complete. The enclosed draft agreement provides for the District to establish an initial principal sum of \$14,000,000 in favor of the California Department of Fish and Wildlife until mitigation milestones are achieved in which the District will be allowed to reduce the principal sum until all mitigation is complete. The final agreement will be substantially similar to the enclosed draft and be reviewed and approved as to form by County Counsel.

The Approved Project will be advertised in accordance with Section 20991 of the State Public Contract Code.

Section 3400 of the State Public Contract Code allows a product to be designated by specific brand name for several purposes, one of which is to obtain a necessary item that is only available from one source, if the awarding authority makes a finding and language is included in the Notice Inviting Bids. The project plans and specifications designate the crash cushion type, REACT 350 II, manufactured by Trinity Highway Products. REACT 350 II is the only available crash cushion that meets the necessary performance requirements. The Notice Inviting Bids will include language describing this finding.

The Approved Project is to be completed over a period of 5 years. It is anticipated the work will start in the fall of 2018 and be completed in the winter of 2023.

Delegating to the Chief Engineer or his designee the authority to award and execute a construction contract will allow for an accelerated contracting process to more quickly minimize flood risk to downstream communities and to avoid potential impacts to the project delivery schedule due to weather and the bird nesting season.

The award of the contract will be in full compliance with Federal, State, and County regulations. The contract agreement will be in the form previously reviewed and approved as to form by County Counsel.

A standard construction contract will be used that contains terms and conditions supporting the Board's ordinances and policies including, but not limited to, the County of Los Angeles' Greater Avenues for Independence and General Relief Opportunities for Work Programs, Contract Language

to Assist in Placement of Displaced County Workers, and Notice to Employees Regarding the Federal Earned Income Credit (Federal Income Tax Law, Internal Revenue Service's Notice 1015).

To ensure that the contract is awarded to a responsible contractor with a satisfactory history of performance, bidders are required to report violations of the False Claims Act, criminal convictions, civil litigation, defaulted contracts with County, complaints filed with the Contractor's State License Board, labor law/payroll violations, and debarment actions. As provided for in Board Policy No. 5.140, the information reported by the contractor will be considered before making a recommendation to award.

The plans and specifications include the contractual provisions, methods, and material requirements necessary for this Approved Project and are on file with Public Works.

### **ENVIRONMENTAL DOCUMENTATION**

On November 12, 2014, Agenda Item 37, the Board acting as Governing Body of the District certified that the FEIR had been completed in compliance with CEQA and approved the environmentally superior project alternative for the Devil's Gate Reservoir Sediment Removal and Management Project. The Board also adopted the Environmental Findings of Fact, a Statement of Overriding Considerations, and an MMRP at the time of certification of the FEIR. The FEIR identified significant and unavoidable impacts in the areas of aesthetics and transportation and traffic. Mitigation measures included in the MMRP addressed impacts in the environmental areas of air quality, biological resources, cultural resources, land use, noise and vibration, and transportation and traffic.

The Board additionally approved the following conditions to address environmental impacts:

1. Further reduce community impacts by including the following provisions in the Devil's Gate Reservoir Sediment Removal and Management Project design plans and specifications:
  - a. Limit hauling hours from the project site to Monday through Friday from 7 a.m. to 3:30 p.m.
  - b. Hauling is to occur only between April 15 to October 15, 2017, with the possibility of continuing until December if a late wet season and a dry fall occur.
  - c. Exclude work on major holidays and major Rose Bowl events.
  - d. Prohibit trucks from staging on city streets.
  - e. Balance truck traffic between the Cities of La Cañada Flintridge and Pasadena.
  - f. Work with the permitting agencies and stakeholders to restore habitat in the project area that is consistent with the Hahamongna Master Plan.
2. Continue collaboration on project design and implementation with the Altadena Town Council and Cities of La Cañada Flintridge and Pasadena.
3. Implement a regular maintenance routine consistent with the FEIR by removing accumulated sediment annually to reduce the future frequency of major sediment removal projects.

These provisions will be included in the plans and specifications for each project and/or permits. Numerous coordination meetings have been held with stakeholders including the unincorporated County community of Altadena, the Cities of La Cañada Flintridge and Pasadena, and the Highland Park neighborhood in the City of Los Angeles. Three public meetings were held on July 13, 14, and 16, 2016, to present the habitat restoration plan that is consistent with the Hahamongna Master Plan. Three additional meetings were scheduled for October 24, 25, and 28, 2017, to inform the public on the project's progress.

Recirculated Portions of the FEIR have been prepared in compliance with CEQA and the Writ of Mandate issued by the Superior Court of the County of Los Angeles, and are on file with the County Clerk of the Board. A Public Notice of the Recirculated Portions of the FEIR was published in the Pasadena Star News and San Gabriel Valley Tribune on July 24, 2017. Comments were accepted for 55 days from July 24 to September 18, 2017. There were 104 comment letters received from residents, local community groups, and local, State, and Federal agencies. Responses to those comments are included in the Final Recirculated Portions of the FEIR. Responses from public agencies were sent to those agencies pursuant to Section 21092.5. The Final Recirculated Portions of the FEIR are enclosed hereto as Exhibit A.

The Recirculated Portions of the FEIR include revisions to only the sections of the FEIR and MMRP for the project, for Alternative 3, Configuration D (Approved Project), and for Alternative 5 (Haul Route Alternative) related to: 1) the 1:1 mitigation ratios in Mitigation Measures BIO-6, -7, and -8; 2) the imposition of Mitigation Measures BIO-1 through 8 on the proposed Devil's Gate Water Conservation Project, should such a project go forward, to reduce potential cumulative impacts for this project; and 3) the requirement, in Mitigation Measure AQ-1, that sediment removal dump trucks meet Environmental Protection Agency's emission standards for Model Year 2010 or later.

The recommended actions are within the scope of the previously certified FEIR as amended by the recirculated portions. The previously adopted MMRP, as revised by the recirculated portions, will continue to apply. The revisions to the MMRP are enclosed hereto as Exhibit B. The District has not received any comments or additional information that constitutes substantial new information requiring recirculation under Public Resources Code Section 21092.11 and State CEQA Guidelines Section 15088.5. Further, no substantial changes including any additions, clarifications, or modifications as related to new information have been brought to light since the circulation of the Recirculated Portions of the FEIR and therefore no additional recirculation is required.

The revisions to the MMRP for the Approved Project are adequately designed to ensure compliance with the mitigation measures during implementation of the current recommended actions; and the significant adverse effects of the recommended actions have either been reduced to an acceptable level or are outweighed by the specific considerations of the Approved Project, as outlined in the revisions to the previously adopted Environmental Findings of Fact and in the previously adopted Statement of Overriding Considerations which continues to apply and remains unchanged. The revisions to the previously adopted Environmental Findings of Fact are enclosed hereto as Exhibit C, and the previously adopted Statement of Overriding Considerations is enclosed hereto as Exhibit D.

The previously certified FEIR is available at [www.devilsgateproject.com/FEIR](http://www.devilsgateproject.com/FEIR). The documents and other materials constituting the record of proceedings, upon which the Board's decision is based in this matter, are located at the County of Los Angeles Department of Public Works, Water Resources Division, 900 South Fremont Avenue, Second Floor, Alhambra, California 91803. The custodian of such documents and materials is Mr. Kenneth Zimmer.

Upon the Board's approval of the recommended actions Public Works will file a Notice of Determination in accordance with Section 21152 of the California Public Resources Code and pay the required fees to the County Clerk.

## **CONTRACTING PROCESS**

The Approved Project will be contracted on an open-competitive bid basis.

An award by the Chief Engineer or his designee will be made upon review of the bids. The contract will be awarded to a responsible contractor who submits the lowest responsive bid meeting the criteria established by the Board and the State Public Contract Code.

In accordance with the Board's consolidated Local and Targeted Worker Hire Policy adopted on September 6, 2016, the project will require that at least 30 percent of the total California craft worker hours for construction of the project be performed by Local Residents and at least 10 percent be performed by Targeted Workers facing employment barriers.

To increase contractor awareness of Public Works' program to contract work out to the private sector, this project will be listed on both the County's "Doing Business with the County" and "Public Works' Business Opportunities" websites for open bids:

<http://www.lacounty.gov/business/doing-business-with-the-county>

<http://dpw.lacounty.gov/general/contracts/opportunities>

Also, Public Works will leverage its social media platform by advertising the solicitation through Twitter.

In addition, in order to increase opportunities for small businesses, Public Works will be coordinating with the Office of Small Business at the Department of Consumer and Business Affairs to maximize outreach, as well as offering preferences to Local Small Business Enterprises in compliance with Los Angeles County Code, Chapter 2.204.

### **IMPACT ON CURRENT SERVICES (OR PROJECTS)**

When the Approved Project is completed, it will have a positive impact by reducing flood risk to the communities adjacent to the Arroyo Seco downstream of Devil's Gate Dam and Reservoir by restoring capacity for flood control and future sediment inflow events.

### **CONCLUSION**

Please return an adopted copy of this letter to the Department of Public Works, Water Resources Division.

The Honorable Board of Supervisors

11/7/2017

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark Pestrella". The signature is fluid and cursive, with the first name "Mark" written in a larger, more prominent script than the last name "Pestrella".

MARK PESTRELLA

Director

MP:SRB:shEnclosures

c: Chief Executive Office (Chia-Ann Yen)  
County Counsel (Mike Simon)  
Executive Office  
Internal Services Department (Countywide  
Contract Compliance)