

August 1, 2008

Honorable Phil Isenberg
Chairman, Delta Vision Blue Ribbon Task Force
650 Capitol Mall
Sacramento, CA 95814

Dear Chairman Isenberg:

The undersigned business and water agency stakeholders support a comprehensive plan for the Delta to achieve the Task Force's co-equal objectives of ecosystem health and water supply reliability for California. While there is much to be done in the final months of the Task Force's effort, we commend the entire Delta Vision team for the tremendous progress to date.

This letter conveys our general comments on the second draft Strategic Plan. While some of the undersigned have and will provide comments as individual entities, we want to provide unified feedback here, as we have done previously.

In broad terms, this Strategic Plan contains the right mix of policy changes and physical actions that can chart the course toward your Vision for the Sacramento-San Joaquin Delta. We have substantive concerns over specific details (or in many instances details to be developed), and believe many concepts need to be thoroughly detailed and scrutinized. However, the flaws we see do not appear to be fatal.

The recent release of the Public Policy Institute's recent report Comparing Futures for the Sacramento-San Joaquin Delta directly addresses the Vision's co-equal objectives and evaluates means of their accomplishment. We urge the Vision process to seriously consider the findings of that report and build upon its analyses.

GENERAL COMMENTS – STRATEGIC PLAN INTRODUCTION

The introduction of second draft of the Strategic Plan accurately characterizes the problem of Delta management and the imperative to manage water supply and the ecosystem in an integrated fashion. This section could use discussion on how the Strategic Plan will be used to better manage of these resources. We elaborate on our ideas in this regard in our discussion of Governance, below.

We also suggest more robust acknowledgment of the BDCP in the introduction and an explicit statement that the Strategic Plan would build upon an adopted BDCP, as related to conservation measures for the Delta ecosystem and water management.

Climate change challenges should be highlighted more aggressively in the introduction as well. Loss of snowpack, increased storm intensity, more flood events, habitat impacts and species dislocation, crop shifting, and sea-level rise all present incredible challenges to the Delta ecosystem and the state's water system.

Finally, reflecting a number of discussions by the Task Force, the introduction needs a link to a improved water supplies capable of sustaining the state's agricultural production. Since

approximately 75% of the state's *developed* water supplies are used by agriculture, they will always be a target for those who promote reallocation among consumptive uses. However, as recent events have shown, food security, from both a supply and public health standpoint, is an emerging issue. Further, with the state's emphasis on containing greenhouse gas emissions, maintaining capacity for domestic food production versus importation, is consistent with needs to limit greenhouse gas generation.

GOVERNANCE AND FINANCE

While we support the general structure of "Governance and Finance" proposals to improve accountability for Delta management while preserving existing authorities as much as possible, we believe the powers suggested to be vested with the Ecosystem and Water Council overreach and debate over that issue could cripple implementation of the Vision. We concur that, ***"Comprehensive and effective governance need not mean centralized governance....Striking the right balance between governmental and private structures; between local, regional and state interests; and between regulatory and market-based incentives are all keys to a successful governance structure."*** With growing concurrence on the major physical and supporting policy initiatives necessary to support achievement of the Vision, getting the governance changes right, while retaining flexibility to grow capacity for any new institutions is now critical.

The basic structural arrangement as proposed appears workable. The Water and Ecosystem Council, however, should be an oversight entity and we believe that creation of yet another plan, let alone one with the complexity envisioned by the California Delta Ecosystem and Water Plan, will lead to unnecessary delay and potential litigation, which would ultimately be counter-productive. We believe that the Task Force's Vision and Strategic Plan provide enough specifics. If executive and legislative direction supported and directed implementation of the Strategic Plan by specific entities and required agency actions to be consistent with the Vision and Strategic Plan to the extent compatible with existing statute, major progress could be made toward the Vision in the near term. Development and adoption of the California Delta Ecosystem and Water Plan, would otherwise create additional years of delay while unnecessary specifics are worked out, particularly relative to overlapping responsibilities and hierarchies that are created when vesting substantial new powers in an Ecosystem Water and Water Council, as envisioned.

As an oversight entity, the Council could play a valuable advisory role in the budget process, consistent with legislative authority directing state budgeting by implementing departments to seek implementation of and be consistent with the Vision and Strategic Plan. The Council should have no role relative to appointments to the Conservancy or permitting authority. As an oversight body, it need not contain agency representation. We believe the current Delta Vision Task Force has exerted a major influence on policy formulation and direction and believe that a similarly constituted Council, with the backing of formalized adoption of the Strategic Plan by the administration and support from the Legislature, would be a measured step in governance reform. In the future to the extent Plan objectives are not being achieved due to inaction or contrary action of implementing agencies, the Council would be in a position to elevate those issues to the Governor and Legislature. If appropriate, additional powers for the Council could be considered at that time.

The proposal's call for a strengthened Delta Protection Commission, a Delta Conservancy, a Delta Science and Engineering Board, a permanent Public Advisory Group and a California Water Utility are workable, but lack enough detail to support the analysis necessary to provide effective comments at this time. While the Task Force continues to develop these specifics we offer these observations. The relationship of the several new entities that would be created to the advisory Delta Ecosystem and Water Council as envisioned above and the deletion of the CDEW Plan should be noted in further developing these concepts. We will be particularly interested in how the Conservancy is designed to function and how existing agency capabilities such as those held by DWR and DFG for executing the physical aspects of restoration project design, development, construction and management could be leveraged by a Conservancy. The Conservancy should also be charged with assisting in the implementation of adopted HCP/NCCP plans whose geographic scopes include the Delta region. As the BRTF and Delta Vision staff is well aware, evaluation of and formulation of a California Water Utility is a complex subject and we pledge our support in the development and evaluation of this concept.

We agree that the SWRCB *“should retain its existing responsibilities and authority....”* We do not believe the Council should subsume any of the SWRCB's authorities. development of water quality plans and flow objectives should remain wholly with the SWRCB. The SWRCB will benefit in its functions from the input of the Science and Engineering Board and continued biological input from DFG. Delta Vision should refrain from attempting to set numeric flow objectives and concern itself with defining policy objectives related to flow, e.g., creating conditions consistent with ecosystem restoration goals or improvements in water supply. As discussed below under Ecosystem, the proposed flow objectives in the Strategic Plan read as if they are ready for adoption when they have not been subject to scientific peer review or impact analysis.

The discussion of the functions of a Delta Operations Team needs more clarity. At page 20 the Team is to “coordinate and make operational decisions on water flows within the estuary on a day-to-day basis”, and “determining what inflows, outflows and exports are necessary to achieve healthy estuarine functions and a reliable water supply, on a continuing basis”. Their decisions would be implemented by a California Water Utility. The California Water Utility, as envisioned, would only control SWP assets and eventually CVP assets. With the vast majority of diversions affecting the Delta controlled by others, it is unclear how the Authority would be able to affect all inflows, outflows and exports. If the intent is that they only control a subset of such flows, it should be so stated, and be clear as to the intent for any change in the control of operations of other projects. Overall, the concept of the Delta Operations Team needs to be discussed in the context of the existing Operations Team: what's different? Why?

The new Delta Science and Engineering Board should focus on applied science and engineering and leave basic research largely to other institutions. Experience with the CALFED scientific peer reviews has often shown a tendency toward theoretical critique that undermines a focus of applied research and experimentation. The PPIC report offers valuable direction in this arena as well.

The concept of adaptive management under Action 1.6 needs to broaden the historic focus beyond simple regulation of the Projects and incorporate action on all stressors. It also needs to incorporate reevaluation of regulatory tools adopted under then current biological understanding and evidence that has since clearly evolved to different understanding (e.g., the X2 standard).

Action 2.2 relative to Environmental Justice is supported but a specific charge needs to be added to evaluate and address the disproportionate impact of low water supply reliability and export restrictions on low income and disadvantaged communities.

We also believe establishment of basic Delta environmental water needs should be determined through a SWRCB Water Quality Control Plan process (which according to the recently adopted SWRCB Bay-Delta work plan is targeted for a late 2010 start date) and implemented through a water rights proceeding. The Vision documents can provide policy objectives, supplementing requirements of law. This proceeding should focus on a Delta transitioning to a new state, with future conveyance changes and not on the Delta as it exists today. We strongly support the incorporation and allowance of market mechanisms to supplement the provision of “environmental water” above and beyond justifiable regulatory baselines.

The Strategic Plan should provide for an evaluation of transferring the recycled water and conservation programs under the SWRCB’s responsibilities over to the “new” DWR so that those activities related to “regional self-sufficiency” could be integrated in one place and allowing the SWRCB to dedicate its resources to water quality planning and water rights administration. Strategies supporting the SWRCB under action 2.3 are important in modernizing SWRCB administration. Integrating water rights compliance through real-time measurement within a SCADA-system data environment could do much to improve water rights compliance and real-time management.

The Strategic Plan should strengthen the ability of the SWRCB to execute its functions and not substitute the Council in its place. The SWRCB should be solicited to identify what resource or administrative changes should be considered to improve its efficacy. Generally when it comes to the SWRCB, we believe the Strategic Plan again has it right stating:

“California already possesses the constitutional and statutory principles necessary to manage the water system in ways envisioned here....The challenge at hand for our state is to improve the application and effectiveness of the legal and institutional structures that already exist. The water rights system, and the information base that underlies it, should be strengthened and clarified so that water managers around the state can make sound long-range decisions that optimize supply reliability and regional self-sufficiency.”

Financing is another area of great interest and concern to us. We appreciate that the Strategic Plan refers to broadly supported CALFED financing principles, and in particular the "beneficiary pays" concept. As discussed in Strategy #3, private beneficiaries need to be defined. The vast majority of water diverted from the Delta and its tributaries is done by public agencies for purposes authorized by the Water Code and so it is unclear who private beneficiaries are in this instance.

A rationale for a fee on all diversions from the watershed is logical as all diversions in the Delta watershed have responsibilities to the Delta, yet not all are currently contributing. However, no rationale for an additional fee imposed on water conveyed through or around the Delta is stated and this needs to be justified. The export agencies are committed to pay the multi-billion portion

of the isolated facility and conservation measure as part of a dual conveyance. These expenditures are known to have very significant environmental benefits that may exceed CVP or SWP mitigation obligations. No state funding is being offered to support those additional environmental benefits. Any additional fee on CVP and SWP water exports then needs to be justified in the context of the beneficiaries pay principle. We urge you to spell out with much more specificity what the funds would be used for, and how and by whom would the funds be managed. There must also be a correlation between the revenues collected and the resulting improvements in water supply or quality (benefits) that justifies them.

Diversion fee sources could be fairly stable revenue streams. These should be linked with key functions that would require a stable source of revenue to be credible, such as ecosystem restoration management and maintenance, and funding of a DWR that no longer had SWP revenues and would now provide statewide water resource planning, guidance and technical support. In each case the result should be a measureable benefit to the entities that may be asked to pay the diversion fee.

REVITALIZE THE DELTA ECOSYSTEM

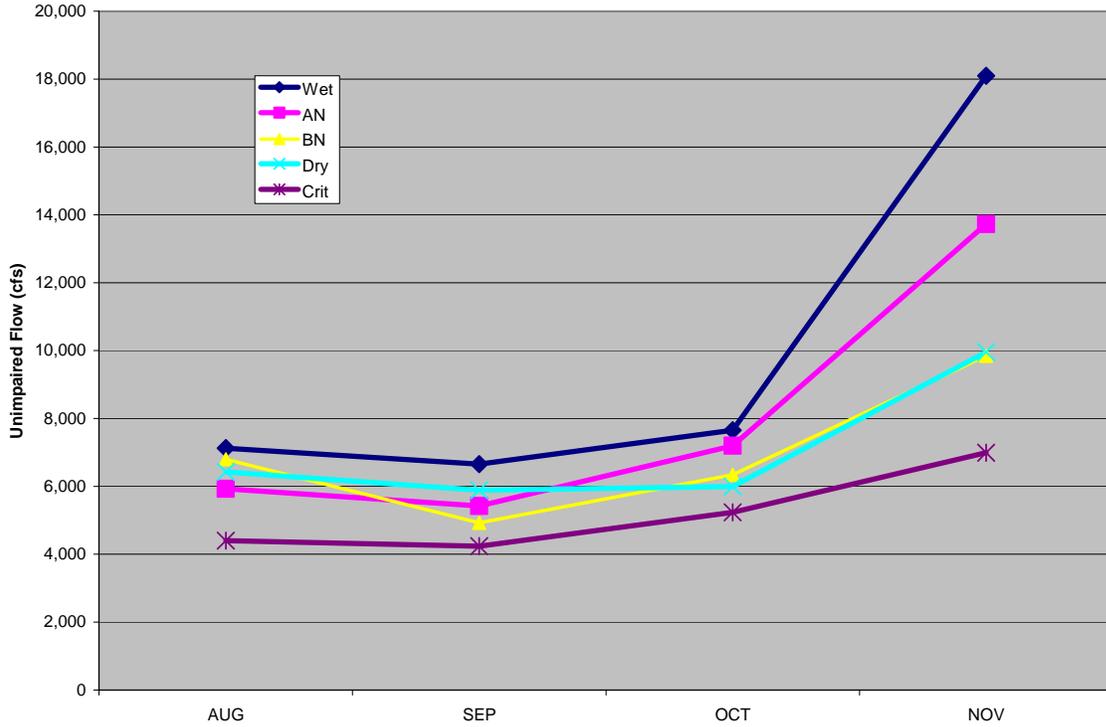
Delta Vision has made great strides in defining a desirable future ecosystem. Strategy No. 4 defining the objective relative to habitat restoration is strong but could use discussion of the need to restore dynamic variability to the system, one of its principal features before human modification and one central to supporting native species and resisting invasives.

There are still embedded tensions between the timing and volume of flows for hypothesized ecosystem enhancements and the maintenance of reliable water deliveries and improved water quality (i.e. the Delta dilemma remains). Significantly, though, we applaud the Strategic Plan's understanding that proposed infrastructure investments in near-term Delta actions, as well as storage and conveyance, are precursors for increasing system flexibility and thus creating more capacity to better manage Delta resources. Nevertheless, the nexus between environmental goals, management, and water operations needs to remain a central theme of continued analysis, discussion and refinement.

We agree with the statement: ***“the task for California today is to restore the underlying ecosystem structure, functions and processes....”*** Attacking all the stressors that are disrupting the ecosystem is a welcome approach, and one that is long overdue.

The ecosystem Performance Targets as presented in the Strategic Plan have not been substantiated with a level of technical rigor necessary for our support. Thus, we support the call for these to be further evaluated by the Science and Engineering Board. While we believe the focus of the targets generally make sense, the specifics, particularly related to flow relationships, simply do not have sufficient scientific basis. For example, the discussion in Strategy No. 5 implies that large fall flows were historically common. Based on unimpaired flows, natural flows in two of the three proposed fall action months (September, October and November) were historically low, with median around 6,000 cfs in most year types for September and October, as shown below. They are consistently below the proposed 11,400 cfs flow level, with the exception of the month of November for Above Normal and Wet years.

Median Summer/Fall Unimpaired Flows by Year Type



Relative to Action 5.1., natural flows would very rarely have been adequate to meet the proposed fall flow standards. In contrast to the text, natural flows would have been in the range of 6,000 cfs for most falls. The proposal for 11,400 cfs outflows would only rarely have occurred under natural conditions (see table below showing percent occurrence for unimpaired conditions). The reference to late 1990s conditions implies that fall flows were a significant factor in producing desirable fishery conditions. There were numerous factors in the late 1990s affecting fisheries, including extremely high spring outflows, low ammonia concentrations, and generally low water temperatures. The relationship for fall flows to population abundance is not as strong as are relationships to these other factors. Additionally, the weak relationship that exists for flow shows minimal improvements in populations for large increases in outflows. The proposals for fall releases would also negatively affect salmonid populations by forcing increased flows in the fall that cannot be sustained, resulting in stranded redds and loss of cold water storage for strategic releases. No analysis of the impact of producing such flows is provided, either on water supply reliability or other ecosystem needs.

Number of Months and Percentage of Time Unimpaired Flows Achieve Proposed 11,400 cfs
Standard for period 1921-2003

Month	Below Normal	Above Normal	Wet
September	N/A	N/A	3(12%)
October	0	1(8%)	5(19%)
November	N/A	7(58%)	19(73%)
Total Months	15	12	26

Given the time involved and the level of scientific scrutiny required, we strongly recommend numeric flow targets not previously subject to, and withstanding, peer review be deleted from the document in favor of narrative statements specifying the desired outcome sought from flow modification. The SWRCB water quality planning process provides an appropriate venue for vetting of specific numeric proposals.

The discussion in Strategy 6.3 relative to reducing export effects on fisheries is generally helpful. The text in criteria #2 needs to be made consistent with the example of Contra Costa water District facilities, cited above. In other words, it should read: "Change capacity relative to demand to permit greater flexibility..."

WATER SUPPLY AND RELIABILITY

We applaud the "Water Supply and Reliability" chapter's clear statement of the water supply challenge California confronts:

"With millions more acre-feet of demand already being established throughout the Delta watershed, with millions more Californians expected in the coming decades, and with climate change altering the very engineering benchmarks around which the system was designed, the California water system as we have known it for the last half-century must evolve in fundamental ways if it is to continue serving the needs of our state....This does not mean compromising on reliability."

The section on Water Supply Reliability recognizes that water agencies have been extensively investing in self-sufficiency and will continue to do so. However, the reliability, quality and volume of imported water supplies via the SWP and CVP are essential in providing a base supply and in supporting local supply development, particularly conjunctive use and wastewater recycling. Export supply is needed in times of plenty to refill groundwater basins relied upon in times of scarcity. Low salinity water is needed to allow regulators to permit recycling projects and to make them cost-effective. The Strategic Plan acknowledges this but is not clear enough: ***"Establishing a level of reliability for Delta exports that is consistent with average quantities diverted in the 1990's can improve opportunities for export communities to implement other actions analogous to regional self-sufficiency."*** We believe this statement needs to be revised to read "capacity available in the 90's", not "quantities diverted". There were many instances in

the 90's where water was available above water quality objectives and after meeting other regulatory and environmental needs (CVPIA requirements, etc.), but there was no available storage in the system or conveyance was limited. Since then, massive new investment in regional storage has occurred and under similar circumstances such water could have been stored for benefit of consumptive uses and the environment, consistent with the Strategic Plan's call to favor wet period diversions over dry period ones. Conveyance improvements could assure that this new storage capacity and future capacity can be utilized.

In action 5.4 , the statements about exports being higher in dry years than in wet years are not correct. Some of the highest export years (e.g., 2006) were in wet years. Exports in dry years can only be low if stored water is carried over from prior years. This discussion seems to be based on the Bulletin 160 charts of water use in three years – 1998, 2000 and 2001 – that are not representative of water year types and a broader analysis of diversion patterns over a wider range of years would be useful in developing these concepts.

In strategy 7.3 a number of cited strategies need modification.

- New development in California already is required to meet conservation-oriented plumbing standards, requiring low flow devices and water and energy using appliances.¹ If additional modifications to code requirements to take advantage of new technology are merited, updating the applicable code should be pursued.
- Requiring all new water use to be “mitigated” is an unnecessary and intrusive insertion of misplaced state interests into local government decision making. The current urban water management planning act and requirements under SB 610 and 221 require the showing of reliable water supplies to new development. In some instances, based on local water supply situations, mitigation is appropriate and in others reliable water supplies exist or are in the implementation process. To overlay a blanket requirement of “mitigation” is inconsistent with current law, and could well be contrary to local integrated regional water management plans. Current law addresses this issue adequately.
- Requiring all new development of a certain size to install “purple pipe” for recycling would be a waste of resources. This language should be made consistent with that at page 48, line 35 which recognizes local water recycling plans. Purple pipe should only be required in locations where there are local plans that recycled water will be available at that location . Delta Vision should review the recommendations of the State Water Recycling Task Force for changes which could promote recycling.
- Requiring that all new development show that it will “not result from additional depletions from California rivers and streams” is inconsistent with many other parts of the document which recognize among other strategies a need to shift diversions to wetter periods. The water rights appropriation process through the SWRCB properly handles the balancing between beneficial uses. A blanket requirement such as suggested here would interfere with the utilization of existing water rights authorized under state law, which requires the balancing of beneficial uses of water. This requirement inappropriately puts environmental uses of water as the top priority for the state, in conflict with the constitution and water code.

¹ Unfortunately, water conservation requirements for new construction are scattered throughout the Health and Safety and Energy Codes.

Strategy 7.4, relative to providing additional incentives for agricultural water conservation needs definition relative to the meaning of water conservation. Language should be included to define conservation here as reductions of consumptive use for a given level of crop production. We recommend defining it as follows: Conservation, relative to the efficient use of water for agriculture, is the use of cost-effective measures that reduce evapotranspiration, evaporation or flows to salt sinks (unusable bodies of water) while not diminishing commodity production.”. Performance targets for agricultural water consumption need to reference this definition.

Action 7.6 cites the potential need for statewide recycled water storage guidelines. We question the utility of such guidelines and what they are intended to produce. Potential recycled water use is often limited due to an excess of irrigation demand over supply in summer months vs. a surplus of water in winter months. Providing storage for recycled water for excess winter flows – when there is little recycled water demand – is fundamentally an economic issue and in some instances, a permitting issue. It is unclear how statewide guidelines could address such issues.

Action 7.7 dealing with transfers and Action 8.6 promoting conjunctive use need to identify that conveyance problems in the Delta limit opportunities for water transfers and conjunctive use. Conveyance uncertainty and lack of capacity is the most pressing problem relative to access to both of these resource management strategies.

Strategy No. 9. (and specifically Action 9.2) promotes movement toward a wet-period diversion and storage system. It should be explicitly recognized that under current court ordered export restrictions such a strategy is effectively impossible. Further, modeling analyses are necessary to investigate the range of potential for this strategy with new conveyance and storage and the current infrastructure constraints that would limit such a strategy. While we support this strategy consistent with one that provides overall supply sufficiency and reliability, there are fundamental limitations to this strategy imposed by capacity limitations of the SWP/CVP aqueduct systems south of the Delta. Recognition of these practical constraints is necessary to put the utility of this concept in context and changes that would be necessary to implement it.

We support the recommendations in Action 9.3 – 9.5: towards development of a dual conveyance facility, relocation of other diversions away from sensitive habitats and connecting legal in-Delta water users to new conveyance. While the PPIC study did not identify a dual facility as its first choice, based upon current understanding we believe a dual facility strategy offers management flexibility for the environment and water supply. Ongoing analyses will continue to inform decision-makers and the public in this regard. We generally concur with PPIC recommendations that very large investments in levee improvements to support a dual conveyance are not appropriate. We believe that dual conveyance relying on more modest investments in emergency response preparation is an important management tool for the next few decades. We similarly support Action 9.6 (complete CALFED surface storage investigations).

The description of Middle River Corridor plan in Action 9.1 is out of date and refers to a specific set of actions that now appear infeasible. The proposal for a siphon and use of Victoria Canal provides extremely limited capacity and has unacceptably high costs. The capacity can't be increased without extensive dredging, and Clean Water Act Section 404 permitting for this appears lengthy and likely infeasible. This discussion should be replaced with a description of

the two-barrier proposal as proposed by a group of agencies (Contra Costa Water District, San Luis & Delta-Mendota Water Authority and Metropolitan Water District of Southern California). The proposed two-barrier approach includes portable barriers at locations on Old River near Holland Tract and Connection Slough. This approach would provide significant management flexibility for reducing entrainment of pelagic species and providing for areas of improved habitat. It's also a reversible approach that provides immediate benefits, capable of ongoing refinements based on operational experience.

The performance measure linking units of economic output to per capita water use, even if segregated by hydrologic region, is of questionable utility. The thinking behind this is not provided in the document and it raises troubling questions for us about comparing "apples to oranges." Macro economic trends which will differ by region (towards a service-based economies, aging populations, lower birth rates and persons per household, growth in inland regions, etc.) could cause the trends in these indicators to be "negative" despite aggressive conservation measures. Moreover, California's water rights law does not hinge on economic value, but "reasonable and beneficial use". If circumstances warrant, conveyance notwithstanding, the market induces water transfers reflecting the time-value of water between beneficial uses. Under the proposed performance measure would such a calculus be applied to the water dedicated to fisheries and other environmental purposes? How would those values be determined? Just as there is a "value" to a healthy ecosystem, there is value of "food security", reduced carbon emissions from growing more food in California rather than shipping it in from out of state or overseas, future economic investment decisions based on an expectation of a reliable water supply, etc. Such detailed performance measures seem unnecessary since generally the market addresses the non-ecosystem trade-offs more efficiently than central planning ever could. Ecosystem "value" is established by policymakers through regulation and balancing choices made in various forums where policymaker discretion is exercised on behalf of the public trust. It may be well that such parameters are better used as indicators rather than objective targets as we do not fully understand the mechanisms in play nor do we control them.

THE DELTA AS A PLACE

The proposals related to "The Delta as a Place" appear reasonable, targeted, and would contribute to achieving the Vision in a manner that also would provide value to the Delta region and the state. We agree that the *"Delta's value comes not just from the economic or infrastructure services that it provides to the state, but also from its intrinsic worth as a community with a distinct natural and cultural heritage."* Creation of a National Heritage Area, a multi-unit California Delta State Recreation Area and gateway/enterprise zones are appealing but additional evaluation needs to be pursued to make sure these designations are compatible. Also, the Strategic Plan's concepts related to transitioning some lands, particularly publically owned, to habitat, subsidence reversal, carbon sequestration and flood management all merit consideration.

We believe that there is an internal inconsistency with respect to levee investments, however. The idea of a "strategic levee investment plan" resonates with us, both as to which levees should receive the most attention and that levees can provide different levels of protection depending upon location in the Delta and/or what is being protected behind them. Under Action 12.2, the recommendation that the Subventions program should eventually seek to raise all levees to

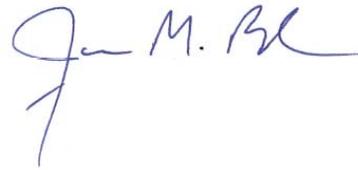
PL 84-99 standards is contradictory to the stated concept of relating the level of levee improvement to commensurate benefits. It is also contrary to findings of the PPIC in their Comparing Delta Futures Report. The PPIC's work shows that a risk-based economic analysis indicates PL 84-99 improvements on many islands are not economically justified. These analyses need to be reviewed and if necessary, additional analytical risk based benefit-cost analyses could be performed and combined with social values/needs before levels of levee improvement standards are established to guide future land use decisions, flood control planning, and levee investment choices.

Conclusion

Congratulations to you and your staff for producing this draft strategic plan. You are carrying out a process that is providing value to California by charting a realistic course to an improved future for the Delta. We look forward to working together in refining the Strategic Plan and commenting on future drafts over the coming months to better meet the challenge of achieving your goals.



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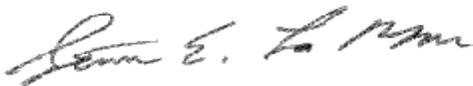
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