



Staff Report

Date: August 2, 2016

To: City Council

From: Valerie J. Barone, City Manager

Reviewed by: Guy Swanger, Chief of Police

Reviewed by: Victoria Walker, Director of Community and Economic Development

Prepared by: Joelle Fockler, MMC, City Clerk
Joelle.fockler@cityofconcord.org
(925) 671-3390

Subject: **Considering responses to three Contra Costa County 2015-16 Grand Jury Reports: No. 1605, *Caring for the Victims: Commercial Sexual Exploitation of Children in Contra Costa County*; No. 1606, *Reclaiming our Water*; and No. 1615, *Truancy and Chronic Absence in Contra Costa County Schools***

Report in Brief

The Contra Costa County Grand Jury has issued Grand Jury Report No. 1605, *Caring for the Victims: Commercial Sexual Exploitation of Children in Contra Costa County*, No. 1606, *Reclaiming our Water*, and No. 1615, *Truancy and Chronic Absence in Contra Costa County Schools*. These reports require a City Council approved response from the City to the findings and recommendations set forth in the report.

Recommended Action

The City Council is requested to review the drafted responses and authorize the City Manager to submit the responses to the Grand Jury on behalf of the City.

Background

Each year the Contra Costa County Grand Jury selects governmental issues to research and analyze on behalf of the citizens of the County. Their reports are intended to help bring exposure to important government issues, to provide research and

City Council Agenda Report

Considering responses to Contra Costa County 2015-16 Grand Jury Reports No.1605, *Caring for the Victims: Commercial Sexual Exploitation of Children in Contra Costa County*, 1606, *Reclaiming our Water*, and 1615, *Truancy and Chronic Absence in Contra Costa County Schools*
August 2, 2016

analysis, and to make findings and recommendations for possible solutions. The result is a report to which identified public entities are required to respond.

The FY 2015-2016 Grand Jury elected to issue the following reports to the City of Concord: *Caring for the Victims: Commercial Sexual Exploitation of Children in Contra Costa County*; *Reclaiming our Water – More Complicated than it Might Appear* and *Truancy and Chronic Absence in Contra Costa County Schools*. These reports (copies attached) provide analysis, findings and recommendations. The Grand Jury has requested that the City of Concord respond to the findings and recommendations within these reports.

Analysis

The topics of the Grand Jury Reports and the recommended responses are discussed below. The Police Department prepared the response to *Caring for the Victims* and *Truancy and Chronic Absence* and the Community and Economic Development Department prepared the response to *Reclaiming our Water*.

In all cases, the City's drafted responses address the identified issues only as they relate to the City of Concord; the City does not have direct knowledge of the other responding organizations, and therefore does not make statements in relation to those organizations.

The format of the response to the findings and recommendations is prescribed by law. With regard to the findings, the Grand Jury requires a response of agreement, disagreement or partial disagreement with discussion of any reason for "non-agreement."

With regard to the recommendations, the Grand Jury requires a response be one of the four listed below:

- The recommendation has been implemented, with a summary describing the implemented actions.
- The recommendation has not yet been implemented, but will be implemented in the future, with a time frame for implementation.
- The recommendation requires further analysis. This response should explain the scope and parameters of the analysis or study, and a time frame for the matter to be prepared for discussion. This time frame shall not exceed six months from the date of the publication of the Grand Jury Report.

City Council Agenda Report

Considering responses to Contra Costa County 2015-16 Grand Jury Reports No.1605, *Caring for the Victims: Commercial Sexual Exploitation of Children in Contra Costa County*, 1606, *Reclaiming our Water*, and 1615, *Truancy and Chronic Absence in Contra Costa County Schools*
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- The recommendation will not be implemented because it is not warranted or is not reasonable, with an explanation thereof.

Each of the three grand jury reports to which staff has prepared a draft response letter is described below. The issued report is attached, as is staff's draft response letter.

Grand Jury Report No. 1605, *Caring for the Victims: Commercial Sexual Exploitation of Children in Contra Costa County* (See Attachments 1 and 2)

As stated in Contra Costa County Grand Jury Report 1605, the Interagency Protocol for Serving Commercially Sexually Exploited Children in Contra Costa County has not been fully implemented throughout the county. The report not only identifies some of the causal factors for this failure in implementation, it also provides recommendations on how the protocol can be fully implemented in order to bring collaboration among public agencies to this most important issue present in our communities. The City of Concord and all public safety agencies in the County were asked to respond to this report.

Grand Jury Report No. 1606, *Reclaiming our Water –More Complicated than it Might Appear* (See Attachments 3 and 4)

As stated in Contra Costa County Grand Jury Report 1606, the recent drought has increased public awareness about the idea of using more recycled wastewater for irrigation and industrial purposes. The Grand Jury inquiry addresses what obstacles are preventing water recycling from occurring on a broader scale.

Grand Jury Report No. 1615: *Truancy and Chronic Absence in Contra Costa County Schools*(See Attachments 5 and 6)

Within Contra Costa County Grand Jury Report 1615, the Grand Jury described the specific need for cities to enact and enforce a daytime curfew ordinance. The value of such ordinances was recognized as decreasing student truancy and chronic absence, and a concurrent decrease in crimes involving juveniles.

The City of Concord and all public safety agencies were asked to respond to this report.

Financial Impact

There is no fiscal impact to the City created by responding to the Grand Jury Reports.

Public Contact

The City Council Agenda was posted.

City Council Agenda Report

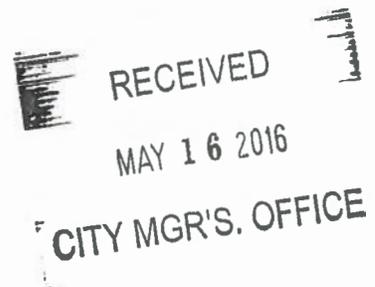
Considering responses to Contra Costa County 2015-16 Grand Jury Reports No.1605, *Caring for the Victims: Commercial Sexual Exploitation of Children in Contra Costa County*, 1606, *Reclaiming our Water*, and 1615, *Truancy and Chronic Absence in Contra Costa County Schools*

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Attachments

1. Grand Jury Report No. 1605, *Human Trafficking: Caring for the Victims: Commercial Sexual Exploitation of Children in Contra Costa County*
2. Proposed Response to Grand Jury Report No. 1605
3. Grand Jury Report No. 1606, *Reclaiming our Water – More Complicated than it Might Appear*
4. Proposed Response to Grand Jury Report No. 1606
5. Grand Jury Report No. 1615, *Truancy and Chronic Absence in Contra Costa County Schools*
6. Proposed Response to Grand Jury Report No. 1615

Grand Jury

Contra
Costa
County725 Court Street
P.O. Box 431
Martinez, CA 94553-0091

May 11, 2016

Mayor Laura M. Hoffmeister
City of Concord
1950 Parkside Drive, MS/01
Concord, CA 94519

Dear Mayor Hoffmeister:

Attached is a copy of Grand Jury Report No. 1605, "Caring for the Victims" by the 2015-2016 Contra Costa Grand Jury.

In accordance with California Penal Code Section 933.05, this report is being provided to you at least two working days before it is released publicly.

In accordance with Section 933.05(a), the responding person or entity shall report one of the following actions in respect to each finding:

- (1) The respondent agrees with the finding.
- (2) The respondent disagrees with the finding.
- (3) The respondent partially disagrees with the finding.

In the cases of both (2) and (3) above, the respondent shall specify the portion of the finding that is disputed, and shall include an explanation of the reasons thereof.

In addition, Section 933.05(b) requires that the respondent reply to each recommendation by stating one of the following actions:

1. The recommendation has been implemented, with a summary describing the implemented action.
2. The recommendation has not yet been implemented, but will be implemented in the future, with a time frame for implementation.
3. The recommendation requires further analysis. This response should explain the scope and parameters of the analysis or study, and a time frame for the matter to be prepared for discussion. This time frame shall not exceed six months from the date of the publication of the Grand Jury Report.
4. The recommendation will not be implemented because it is not warranted or is not reasonable, with an explanation thereof.

Please be aware that Section 933.05 specifies that no officer, agency, department or governing body of a public agency shall disclose any contents of the report prior to its public release. Please ensure that your response to the above noted Grand Jury report includes the mandated items. We will expect your response, using the form described by the quoted Government Code, no later than **August 17, 2016**.

Please send a copy of your response in hard copy to the Grand Jury, as well as a copy by e-mail in Word to epant@contracosta.courts.ca.gov.

Please confirm receipt by responding via e-mail to epant@contracosta.courts.ca.gov.

Sincerely,

Michael Simmons, Foreperson
2015-2016 Contra Costa County Civil Grand Jury

**A REPORT BY
THE 2015-2016 CONTRA COSTA COUNTY GRAND JURY
725 Court Street
Martinez, California 94553**

Report 1605

Caring for the Victims

Commercial Sexual Exploitation of Children in Contra Costa County

APPROVED BY THE GRAND JURY:

Date: May 10, 2016

Michael Simmons

MICHAEL SIMMONS
GRAND JURY FOREPERSON

ACCEPTED FOR FILING:

Date: May 6, 2016

John T. Laettner

JOHN T. LAETTNER
JUDGE OF THE SUPERIOR COURT

Contact: Michael Simmons
Foreperson
925-957-5638

Contra Costa County Grand Jury Report 1605

Caring for the Victims

Commercial Sexual Exploitation of Children in Contra Costa County

**TO: Contra Costa County Board of Supervisors
Contra Costa County Sheriff
The City Councils for the following cities: Antioch, Brentwood,
Clayton, Concord, Danville, El Cerrito, Hercules, Lafayette,
Martinez, Moraga, Oakley, Orinda, Pinole, Pittsburg, Pleasant
Hill, Richmond, San Ramon, San Pablo, Walnut Creek**

SUMMARY

Human trafficking is a nationwide problem. In Contra Costa County, law enforcement and other agencies identified at least 108 victims of human trafficking from June 2014 through June 2015; of those cases, thirty-nine involved minors exploited for sex.

The County organized its official response to the problem of human trafficking by organizing a "Coalition of Zero Tolerance for Human Trafficking Summit" in January 2015. The Coalition set up a broad framework for understanding and dealing with human trafficking, which began with training two hundred employees of the Employment & Human Services Department (EHSD) and its interagency partners (County agencies and non-government organizations). EHSD assigned the more difficult problem of caring for commercial sexual exploitation of children (CSEC) to Children and Family Services (CFS), a bureau of EHSD.

CFS started work on a protocol to establish a comprehensive system of care for victims of CSEC, a system that did not previously exist in the County (the "CSEC Protocol"). By October 2015, the CSEC Protocol was complete and submitted to the California State Department of Social Services. However, by March 2016, more than a year after the Coalition Summit, the CSEC Protocol was yet to be fully communicated throughout the County, much less implemented. Many of the interagency partners who are to assist in implementing the Protocol (particularly the police departments of the cities, victim advocates in the District Attorney's (DA) Office and Juvenile Hall) were unaware of their

part in the Protocol and the role of the other agencies.

Until the Protocol is fully implemented, Contra Costa County still does not have a comprehensive system of care for victims of CSEC.

METHODOLOGY

In its 7-month investigation, the Grand Jury:

- Reviewed the pertinent legal statutes on human trafficking and CSEC, both California and Federal,
- Researched State and County documents and reports on the issue,
- Joined meetings of the Coalition for Zero Tolerance for Human Trafficking and the CSEC Steering Committee,
- Visited Juvenile Hall, the Family Justice Center and Calli House for discussions,
- Interviewed representatives and social workers at the Employment & Human Services (EHS) Department, including the Children & Family Services (CFS) bureau,
- Interviewed Probation Department personnel,
- Interviewed police officers from several cities, who worked directly on sex crimes, drugs, domestic violence and human trafficking,
- Interviewed personnel from non-governmental organizations (NGOs) dealing with sexual violence and CSEC victims,
- Interviewed victim advocates from various agencies.

BACKGROUND

Human trafficking exists in Contra Costa County as it does throughout the United States. It is today's version of slavery. Its victims are exploited due to their lack of resources and sophistication, and treated as commodities rather than as human beings.

Human trafficking exists in four forms:

- Labor trafficking,
- Adult sex trafficking,
- Commercial sexual exploitation of children (CSEC),
- Domestic servitude.

The citizens of Contra Costa County are living with this form of slavery hidden in their midst.

In 2012, California Attorney General Kamala Harris released her report - "The State of Human Trafficking in California" (the AG Report). In the AG Report, Ms. Harris states that human trafficking as a criminal business enterprise (\$32 billion globally) is second only to the drug trade in annual revenues. The AG Report's most important recommendation is that government agencies and the community should take a victim-centered approach in dealing with this crime.

Perhaps the most appalling category of human trafficking is the sexual exploitation of children. Children sexually exploited for commercial reasons cannot legally consent to sex and, therefore, are not willing prostitutes. Victims of CSEC are initiated into sexual slavery between 12 to 14 years old on average. The majority of these children are American citizens according to the County Coalition's Human Trafficking summit report. Typically, they are victims of physical abuse, sexual assault, and psychological and emotional manipulation by adults, i.e., the pimps and the johns. The trauma, stemming from months or years of sexual abuse and emotional manipulation is complex and extensive. For this reason, the County Coalition against Human Trafficking suggests County personnel (law enforcement and social workers) who interact with the CSEC children should be trauma-informed, i.e., properly trained and aware of the complex trauma that the children have undergone.

This Grand Jury report concentrates on the County's efforts to identify, rescue and care for these children and to restore to them a life that is safe, secure and productive.

DISCUSSION

Prior to the AG Report and the first County summit meeting in January 2015, the County had no formal plan or protocol to address CSEC.

County agencies began to develop that protocol by focusing on the applicable law. Section 236.1 of the California Penal Code addresses human trafficking (including CSEC). With respect to CSEC victims, it provides:

- *“Any person who causes, induces, or persuades a person who is a minor to engage in a commercial sex act is guilty of human trafficking.”*
- *“Consent by a victim of human trafficking who is a minor at the time of commission of the offense is not a defense to a criminal prosecution under this section.”*

The following two provisions on CSEC are set forth in the Welfare and Institutions Code:

- Section 300. *“... a child who is sexually trafficked as described in 236.1 of the Penal Code or who receives food and shelter in exchange for, or who is paid to perform sexual acts described in Section 236.1 or 11165.1 of the Penal Code, and whose parent or guardian failed to, or was unable to, protect the child... is within the jurisdiction of the juvenile court which may adjudge that person to be a **dependent child of the court** These children shall be known as commercially sexually exploited children.”* (Emphasis added.)
- Section 300.2 *“... the purpose of the provisions of this chapter relating to dependent children is to provide maximum safety and protection for children who are currently being physically, sexually, or emotionally abused, being neglected, or being exploited, and to ensure the safety, protection, and physical and emotional well-being of [such] children.”*

In January 2015, three years after the AG Report, the Contra Costa County District Attorney called for a summit on human trafficking. Chaired by a senior manager from EHSD, a multi-disciplinary coalition was formed called the Coalition for Zero Tolerance for Human Trafficking.

In June 2015, the Coalition Chair issued a memo to the Board of Supervisors stating that a comprehensive system of care for victims of CSEC does not exist in Contra Costa County. The memo also said that the best practice for care of victims of CSEC might be the Family Justice Centers in Richmond and Concord. These are multiservice centers – “one-stop-shops” – for victims of domestic violence.

Under state law, EHSD is designated as the lead agency for setting up a system of care for the victims of human trafficking in Contra Costa County. In March 2015, the Coalition tasked CFS, a division of EHSD, with organizing a CSEC Steering Committee.

The Committee was to prepare an interagency protocol (the "CSEC Protocol") for the care of victims of CSEC in Contra Costa County.

In developing a protocol, the Committee acted in accordance with Welfare and Institutions (WIC) Code sections 16524.6– 16524.11, These WIC sections provide, in part:

- 16524.6 "...in order to adequately serve children who have been sexually exploited, it is necessary that counties develop and utilize a multidisciplinary approach to case management, service planning and provision of services."
- 16524.6 "... that counties develop and utilize interagency protocols to ensure services are provided as needed to this population."
- 16524.7. (a) (1) "There is hereby established the Commercially Sexually Exploited Children Program. This program shall be administered by the State Department of Social Services."
- 16524.7. (a) (2) "The department, in consultation with the County Welfare Directors of California, shall develop an allocation methodology to distribute funding for the program. Funds allocated shall be utilized to cover expenditures related to the costs of implementing the program, prevention and intervention services, and training related to children who are victims of commercial sexual exploitation."
- 16524.7. (a) (4) "Funds provided to the counties electing to participate in the program shall be used for prevention activities, intervention activities and services to children who are victims, or at risk of becoming victims, of commercial sexual exploitation."
- 16524.7. (a) (4) (D) [A key mandate to the funding allocation is] "hiring county staff trained and specialized to work with children who are victims of commercial sexual exploitation to support victims and their caregivers, and to provide case management interagency and cross-departmental response." (Emphasis added.)

In October 2015, the CSEC Steering Committee was renamed CSEC Protocol Oversight Committee. The Committee submitted the "Interagency Protocol for Serving Commercially Sexually Exploited Children in Contra Costa County" (the "CSEC Protocol") to the State Department of Social Services. This move allowed the County to participate in California's CSEC Program, thereby qualifying for funds to support victims of CSEC.

The State Department of Social Services initially released \$25,000 to the County for CSEC planning. In early 2016, the State then released \$277,628 as a Tier II grant for training and actual services for victims of CSEC. The State also earmarked \$82,107 as "Augmentation for Federal CSEC activities."

The CSEC Protocol sets up the framework for collaboration and coordination among County agencies, cities and NGOs providing rescue, protection and care for victims of CSEC.

The Protocol states, in part:

- *"This Protocol has been created and adopted by the CSEC Protocol Oversight Committee."*
- *"Contra Costa County Children & Family Services (CFS) will be responsible for providing leadership and staff support for the CSEC Protocol Oversight Committee."*
- *"[The Committee, led by CFS,] will implement and oversee the Interagency Protocol."*
- *"Additionally, the [interagency] partners will create protocols (within their own agencies or NGOs) to aid in the identification, assessment and delivery of services to CSEC youth in the community."*
- *Mental Health, under County Health Department should "perform assessment of a CSEC victim's mental health and recommend services."*

The Protocol also contains a flow chart that shows the coordinated response for a victim of CSEC from the community, law enforcement and CFS. At all of the major decision points, referrals to CFS and hotline calls to CFS are the key initial action points. In essence, CFS is the proposed hub and navigator for care of victims of CSEC.

To date, over 200 CFS personnel have received basic training, a starting point for training staff to care for victims of CSEC. Additional training is necessary for the specialization of certain personnel to act as the "navigators" for the victims of CSEC within Child Welfare. This carries out the mandate of Section 16524.7 of the Welfare & Institutions Code, which requires *"hiring county staff trained and specialized to work with children who are victims of commercial sexual exploitation."* (Emphasis added.)

Because Contra Costa County lacks foster parents with specialized training to handle victims of CSEC, social workers often must place these children in foster homes outside of the County. Although a concern and a cause of additional expense to the County, the benefit may be that it puts more distance between the victim of CSEC and his or her exploiters.

Training for law enforcement personnel (police officers and deputy sheriffs) in interviewing victims of CSEC needs to be more victim-centered and trauma-informed. Many officers do not have even basic CSEC training, only a short briefing on the

subject. This lack of training may contribute to the unwillingness of a majority of suspected victims of CSEC to name their pimp exploiters or to accept needed social services and mental health appraisal/therapy. These youths are usually distrustful of police. Estimates of cooperation by victims of CSEC are uniformly low. Such estimates run from a high of 2 out of 10, to 2 out of 100, with one estimate of "zero cooperation." The non-cooperation behavior may also be due to the coercion and manipulation practiced by the children's exploiters.

Perhaps indicative of the lack of CSEC training for law enforcement first responders, the DA's Office has prosecuted fewer cases of CSEC pimps in 2015 than it has in previous years.

The current typical referral practice among law enforcement personnel (city police, the DA's Office and Juvenile Hall) who encounter CSEC youth is to call in Community Violence Solutions (CVS), a non-government organization (NGO) specializing in domestic violence, sexual assault and trafficking victims. Although well regarded in its area of expertise, CVS has limited resources. Whether future referrals to CVS will continue remains unknown, since the new Protocol proposes that the hub of care for victims of CSEC should be CFS, not CVS.

Law enforcement also calls in the victim advocates from the DA's Office. These advocates navigate victim assistance for the law enforcement community. Victim advocates respond first by keeping the victims of CSEC safe, usually within Juvenile Hall, and providing them with therapy, using non-Health Department therapists, who are paid for by victim compensation funds.

As a pragmatic measure, law enforcement sometimes books suspected victims of CSEC into Juvenile Hall under various statutes in the Welfare and Institutions Code dealing with crimes committed by youth. Such bookings allow authorities to keep victims of CSEC under protective custody, away from their exploiters. It also provides Probation and CVS time to assess the situation and to give these youth access to therapy and social services. However, Juvenile Hall rarely consults CFS social workers in these situations. Due to this lack of consultation with CFS, a non-criminal hold order for the child is seldom requested. Placing the child in Juvenile Hall on a criminal charge runs the risk of exposing the child to criminal behavior. Once in Juvenile Hall, most victims of CSEC are uncooperative and ultimately released back to their next of kin where they will likely walk back to their exploiters. Return of these children to an unsafe situation conflicts with the mandate of Section 300 of the Welfare & Institutions Code, which is *"to provide maximum safety and protection to children who are currently being physically, sexually, or emotionally abused."*

Calli House, part of the Contra Costa Health Department's Homeless Youth Services, is another facility, separate from Juvenile Hall and CVS, which is available for CSEC support services. Calli House provides temporary health, therapy and housing assistance to runaway minors in the County. Occasionally, upon request by CVS or CFS, it takes in suspected victims of CSEC who are not booked into Juvenile Hall. CFS

does not have an equivalent county-funded temporary housing facility for victims of CSEC.

The County lacks a centralized database covering all CSEC arrests, referrals and pending cases. Such data would be extremely valuable both in assisting law enforcement in tracking down the exploiters, as well as providing a broader and more complete picture of the victims of CSEC and treatment options with the highest chances of success. Some city police departments share CSEC data with the FBI and the DA's Office. Juvenile Hall shares resident data with CVS when called in to assist on suspected victims of CSEC. The DA's Office shares CSEC data with CVS, when utilizing the Children Interview Center for forensic interviews with suspected victims. CFS has its own CSEC data for its child welfare cases. However, such departmentalized data tracking is no substitute for a comprehensive and centralized database open to all agencies within the County.

FINDINGS

- F1 A comprehensive system of care for victims of CSEC still has not been fully implemented in Contra Costa County.
- F2 The County is now 15 months into developing and implementing this comprehensive system of care for victims of CSEC that it began developing in January 2015.
- F3 A CSEC Protocol, which provides a comprehensive system of care for victims of CSEC, was prepared under the leadership of CFS.
- F4 The CSEC Protocol provides the framework for cooperation and coordination among the County, its cities and NGOs.
- F5 The State Department of Social Services has released Contra Costa County's allocations of CSEC monies under the Commercially Sexually Exploited Children Program administered by the State Department of Social Services.
- F6 Many social workers in CFS, law enforcement, officers in Juvenile Hall and victim advocates in the DA's Office are not implementing the CSEC Protocol because they have not seen it.
- F7. CFS, the leader of the Oversight Committee, has not followed up with its interagency partners that have signed off on the Protocol, but have not submitted their own CSEC department plan/protocols to the Oversight Committee.
- F8 CFS lacks personnel who can act as the hub of all CSEC referrals from law enforcement by assessing the health, psychiatric and physical needs of victims of CSEC and who can navigate these services for them.
- F9. Suspected CSEC victims are being arrested and booked into Juvenile Hall for their own safety pursuant to various statutes under the Welfare & Institutions Code, relating to infractions and crimes committed by youth, while the County assesses the appropriate health and social services to provide.
- F10. The County has not provided funding to CFS for temporary housing facility for victims of CSEC.
- F11. No single database covering all CSEC-related arrests, referrals and pending cases exists in the County.
- F12. Due to the lack of a single database in the County covering all CSEC-related arrests, referrals and pending cases, the County does not know the number of victims of CSEC and where they are located.

- F13. County personnel and law enforcement dealing with victims of CSEC are well-meaning, compassionate and dedicated people trying to make the best of a very difficult situation.
- F14. Most County personnel and law enforcement dealing with victims of CSEC lack in-depth CSEC training, necessary facilities for temporarily accommodating the victims and a clear-cut plan of action, which lays out how to rescue, protect and serve the victims of CSEC in a manner that is caring and trauma-informed.

RECOMMENDATIONS

- R1 The Board of Supervisors should review the Interagency Protocol for Serving Commercially Sexually Exploited Children in Contra Costa County finalized in October 2015.
- R2 The Board of Supervisors, City Councils and Sheriff's Department should consider recommending that all CSEC interagency partners, as listed in the CSEC Protocol, in Contra Costa County adopt their own CSEC protocols and submit them to CFS for approval.
- R3 The Board of Supervisors should consider directing CFS, as the lead implementing bureau, to follow up on the required plans and protocols from the interagency partners, as listed in the CSEC Protocol, implementing the CSEC Protocol.
- R4 The Board of Supervisors should consider directing CFS to expand its CSEC Response Flow Chart to include all critical steps to be taken for the welfare of the child victim, including mental health evaluation by the Health Department and child Welfare hold requests by the social workers.
- R5 The Board of Supervisors should consider directing CFS to train or hire specialized CSEC personnel who will serve as points of primary referral and assist in navigating the services provided to victims of CSEC utilizing funds provided by the State Department of Social Services.
- R6 The Board of Supervisors should consider directing CFS to follow the model of the Family Justice Centers in assisting victims of CSEC navigate the multitude of available services.
- R7 The Board of Supervisors should consider seeking funds to acquire or lease a physical facility to temporarily house victims of CSEC, which would allow suspected victims of CSEC to be placed in a legal, non-criminal temporary hold, rather than having law enforcement book the child into Juvenile Hall with a criminal charge.
- R8 If the County secures funding to construct or lease a CFS physical facility, the Board of Supervisors should consider housing specialized CSEC navigators at the facility, similar to the model used by the Calli House.

R9 The Board of Supervisors, City Councils, and Sheriff's Department should consider recommending that all first responders (usually law enforcement) refer suspected victims of CSEC to specialized and dedicated CSEC personnel, to be established within CFS.

R10 The Board of Supervisors should direct CFS to formulate CSEC training programs, containing different emphases for different County departments, interacting with victims of CSEC.

R11 City Councils and Sheriff's Department should direct law enforcement to avail themselves of CSEC training programs formulated by CFS.

REQUIRED RESPONSES

	<u>Findings</u>	<u>Recommendations</u>
Contra Costa County Board of Supervisors	F1-14	R1-10
Contra Costa County Sheriff's Department	F6, F7, F9, F11-F14	R2, R9, R11
City of Antioch	F6, F7, F9, F11-F14	R2, R9, R11
City of Brentwood	F6, F7, F9, F11-F14	R2, R9, R11
City of Clayton	F6, F7, F9, F11-F14	R2, R9, R11
City of Concord	F6, F7, F9, F11-F14	R2, R9, R11
City of Danville	F6, F7, F9, F11-F14	R2, R9, R11
City of El Cerrito	F6, F7, F9, F11-F14	R2, R9, R11
City of Hercules	F6, F7, F9, F11-F14	R2, R9, R11
City of Lafayette	F6, F7, F9, F11-F14	R2, R9, R11
City of Martinez	F6, F7, F9, F11-F14	R2, R9, R11
City of Moraga	F6, F7, F9, F11-F14	R2, R9, R11
City of Oakley	F6, F7, F9, F11-F14	R2, R9, R11
City of Orinda	F6, F7, F9, F11-F14	R2, R9, R11
City of Pinole	F6, F7, F9, F11-F14	R2, R9, R11
City of Pleasant Hill	F6, F7, F9, F11-F14	R2, R9, R11

City of Pittsburg	F6, F7, F9, F11-F14	R2, R9, R11
City of Richmond	F6, F7, F9, F11-F14	R2, R9, R11
City of San Pablo	F6, F7, F9, F11-F14	R2, R9, R11
City of San Ramon	F6, F7, F9, F11-F14	R2, R9, R11
City of Walnut Creek	F6, F7, F9, F11-F14	R2, R9, R11

These responses must be provided in the format and by the date set forth in the cover letter that accompanies this report. An electronic copy of these responses in the form of a Word document should be sent by e-mail to epant@contracosta.courts.ca.gov and a hard (paper) copy should be sent to:

Civil Grand Jury – Foreperson

725 Court Street

P.O. Box 431

Martinez, CA 94553-0091

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August 2, 2016

By U.S. Mail and email (epant@contracosta.courts.ca.gov)

Mr. Michael Simmons, Foreperson
Contra Costa Civil Grand Jury
725 Court Street
P.O. Box 431
Martinez, CA 94553-0091

Re: City of Concord Response to May 11, 2016 Grand Jury Report No. 1605, "Caring for the Victims: Commercial Sexual Exploitation of Children in Contra Costa County"

Dear Mr. Simmons:

This letter serves as the City of Concord's response to the Contra Costa County Grand Jury's findings and recommendations set forth in Report No. 1605, entitled "Caring for the Victims: Commercial Sexual Exploitation of Children in Contra Costa County." This letter was reviewed by the Concord City Council at its August 2, 2016 City Council Meeting, and I was directed to submit the response for the City of Concord.

I. FINDINGS

Finding No. 6: "Many social workers in CFS, law enforcement, officers in Juvenile Hall and victim advocates in the DA's Office are not implementing the CSEC Protocol because they have not seen it."

Response to Finding No. 6: The City of Concord agrees with this finding.

Finding No. 7: "CFS, the leader of the Oversight Committee, has not followed up with its interagency partners that have signed off on the Protocol, but have not submitted their own CSEC department plan/protocols to the Oversight Committee."

Response to Finding No. 7: The City of Concord agrees with this finding.

Finding No. 9: "Suspected CSEC victims are being arrested and booked into Juvenile Hall for their own safety pursuant to various statutes under the Welfare & Institutions Code,

relating to infractions and crimes committed by youth, while County assesses the appropriate health and social services to provide.”

Response to Finding No. 9: The City of Concord agrees with this finding.

Finding No. 11: “No single database covering all CSES-related arrests, referrals and pending cases exists in the County.”

Response to Finding No. 11: The City of Concord agrees with this finding.

Finding No. 12: “Due to the lack of a single database in the County covering all CSES-related arrests, referrals and pending cases, the County does not know the number of victims of CSEC and where they are located.”

Response to Finding No. 12: The City of Concord agrees with this finding.

Finding No. 13: “County Personnel and law enforcement dealing with victims of CSEC are well-meaning, compassionate and dedicated people trying to make the best of a very difficult situation.”

Response to Finding No. 13: The City of Concord agrees with this finding.

Finding No. 14: “Most County personnel and law enforcement dealing with victims of CSEC lack in-depth CSEC training, necessary facilities for temporarily accommodating the victims and a clear-cut plan of action, which lays out how to rescue, protect and serve the victims of CSEC in a manner that is caring and trauma-informed.”

Response to Finding No. 14: The City of Concord agrees with this finding.

II. RECOMMENDATIONS

Recommendation No. 2: “The Board of Supervisors, City Councils, and Sheriff’s Department should consider recommending that all CSEC interagency partners, as listed in the CSEC Protocol, in Contra Costa County adopt their own CSEC protocols and submit them to CFS for approval.”

Response to Recommendation No. 2: The City of Concord will not implement this recommendation. Agency-specific protocols are often unique to the individual agency and fail to bring consistency to the issue at hand. A unified and thorough approach is needed in order to bring collaboration with public safety partners to positively impact the alarming rate of Human Trafficking occurring throughout the county.

It is our recommendation CFS work with CVS and the County Chief’s to develop a protocol for all law enforcement agencies in Contra Costa County. A county-wide protocol should be

adopted by every agency resulting in consistency while focusing on victims, services and centers they can access, in the hope of mitigating the number of victims and the trauma they experience.

Recommendation No. 9: “The Board of Supervisors, City Councils, and Sheriff’s Department should consider recommending that all first responders (usually law enforcement) refer suspected victims of CSEC to specialized and dedicated CSEC personnel, to be established within CFS.”

Response to Recommendation No. 9: The City of Concord will not implement this recommendation as it is too vague, requiring more specificity and further analysis. Although the recommendation appears to be valuable, it lacks specificity on who the personnel will be, how they will be specialized, and how victims will be referred to them. Further, it is our recommendation that CVS be involved with this process. The City of Concord is willing to work with whoever is needed to pursue this recommendation.

Recommendation No. 11: “City Councils and Sheriff’s Department should direct law enforcement to avail themselves of CSEC training programs formulated by CFS.”

Response to Recommendation No. 11: The City of Concord agrees with this recommendation although we highly recommend CVS be involved with any such training programs.

Guy Swanger, Chief of Police, is available to answer any questions or provide any additional information concerning the above responses or enclosed documents. You can reach him at (925) 671-3193 or by email at guy.swanger@cityofconcord.org.

Sincerely,

Valerie J. Barone
City Manager



May 24, 2016

Mayor Laura M. Hoffmeister
City of Concord
1950 Parkside Drive, MS/01
Concord, CA 94519

Dear Mayor Hoffmeister:

Attached is a copy of Grand Jury Report No. 1606, "Reclaiming our Water" by the 2015-2016 Contra Costa Grand Jury.

In accordance with California Penal Code Section 933.05, this report is being provided to you at least two working days before it is released publicly.

In accordance with Section 933.05(a), the responding person or entity shall report one of the following actions in respect to each finding:

- (1) The respondent agrees with the finding.
- (2) The respondent disagrees with the finding.
- (3) The respondent partially disagrees with the finding.

In the cases of both (2) and (3) above, the respondent shall specify the portion of the finding that is disputed, and shall include an explanation of the reasons thereof.

In addition, Section 933 05(b) requires that the respondent reply to each recommendation by stating one of the following actions:

- 1. The recommendation has been implemented, with a summary describing the implemented action.
- 2. The recommendation has not yet been implemented, but will be implemented in the future, with a time frame for implementation.
- 3. The recommendation requires further analysis. This response should explain the scope and parameters of the analysis or study, and a time frame for the matter to be prepared for discussion. This time frame shall not exceed six months from the date of the publication of the Grand Jury Report.
- 4. The recommendation will not be implemented because it is not warranted or is not reasonable, with an explanation thereof.

Please be aware that Section 933.05 specifies that no officer, agency, department or governing body of a public agency shall disclose any contents of the report prior to its public release. Please ensure that your response to the above noted Grand Jury report includes the mandated items. We will expect your response, using the form described by the quoted Government Code, no later than **August 31, 2016**.

Please send a copy of your response in hard copy to the Grand Jury, as well as a copy by e-mail in Word to epant@contracosta.courts.ca.gov.

Please confirm receipt by responding via e-mail to epant@contracosta.courts.ca.gov.

Sincerely,

Michael Simmons, Foreperson
2015-2016 Contra Costa County Civil Grand Jury

**A REPORT BY
THE 2015-2016 CONTRA COSTA COUNTY GRAND JURY
725 Court Street
Martinez, California 94553**

Report 1606

Reclaiming our Water

More Complicated than it Might Appear

APPROVED BY THE GRAND JURY:

Date: May 24, 2016

Michael Simmons

MICHAEL SIMMONS
GRAND JURY FOREPERSON

ACCEPTED FOR FILING:

Date: May 20, 2016

John T. Laettner

JOHN T. LAETTNER
JUDGE OF THE SUPERIOR COURT

Contra Costa County Grand Jury Report 1606

Reclaiming our Water

More Complicated than it Might Appear

TO: Contra Costa County Board of Supervisors; City Councils of the Cities of Concord, San Ramon, and Walnut Creek; Boards of Directors for Central Contra Costa Sanitary District, Contra Costa Water District, Dublin San Ramon Services District, and East Bay Municipal Utilities District

SUMMARY

The recent drought has raised public awareness about the idea of using more recycled wastewater for irrigation and industrial purposes. The Grand Jury launched an inquiry into what obstacles were preventing water recycling from occurring on a broader scale.

While the recent El Niño storms provided some respite from the current drought, it is too soon to know if this is the end of this drought cycle or just a short pause to the start of a much longer mega-drought.¹ In either event, recycled and recovered water are key factors in achieving sustainable solutions to the water problems within Contra Costa County (County).

More can be done to maximize the use of recycled and reclaimed water in the County, but the infrastructure is not in place and any increase in supply must be carefully balanced with customer demand. Other obstacles in pursuing such a plan include: infrastructure cost, quality of the recycled water, identifying willing customers, facilitating water and wastewater utility cooperation, and potential legal challenges under California's Proposition 218.² Another challenge lies in the comparative cost of

¹ *The West Without Water* – B. Lynn Ingram and Frances Malamud-Roam (2013) and studies done for Contra Costa Water District note that tree ring and other historic evidence (such as changes in Delta salinity levels) suggest California experienced several hundred-year-long droughts in the past 1000 years.

² (<http://www.californiataxdata.com/pdf/proposition218.pdf>)

desalinization plants. In Southern California brackish water desalination costs around \$1600/acre-foot, and sea water desalination costs around \$2400/acre-foot. By comparison, Central Valley Project water, which is used in this County, costs around \$600/acre-foot at the point it is delivered to the treatment plant.

We learned that little is being done to increase capture of stormwater for reuse. Additionally, opportunities exist for supplying recycled water to industrial users, and “wheeling” the previously supplied fresh water to other customers in the County.

This report makes recommendations that address these findings. They include:

- Facilitating (possibly through a Task Force) the formation of a Joint Powers Authority (JPA) to: (i) integrate efforts to use recycled wastewater, (ii) capture stormwater, and (iii) revisit desalination options to supplement the County’s water needs
- Promoting siting of desalination demonstration plants by making unused or under-used County land available for lease
- Promoting public awareness, education and involvement by forming a Water Reuse Advisory Council that includes citizen stakeholders and technology experts to advise the Board of Supervisors
- Adopting ordinances that promulgate recycling and recovery of water on a county-wide basis, with appropriate rules for planned communities and large commercial buildings
- Emphasizing capture and reuse of stormwater where possible in all new County flood control projects
- Promoting on-site capture and reuse of stormwater wherever practical
- Facilitating the use of satellite wastewater treatment plants, where appropriate



Los Vaqueros Reservoir (CCWD)

GLOSSARY OF TERMS AND ACRONYMS

Acre-feet per year (afy)—1 acre-foot = 325,851 gallons or 1233.5 cubic meters
Million gallons per day (mgd)—1 million gallons per day = 1121 afy
Brackish Water— saline water with TDS between 1,000 to 10,000 parts per million
California Department of Water Resources (DWR)
Central Valley Project— irrigation project managed by U.S. Bureau of Reclamation
Clean Water Act— federal law governing pollution of surface water
Desalination— removal of salts and dissolved solids from saltwater (brackish or sea)
Direct Potable Reuse (DPR)—wastewater cleaned sufficiently for direct reuse
Humidification Dehumidification (HDH)—alternative desalination technology
Indirect Potable Reuse (IPR)—term for wastewater cleaned sufficiently for indirect reuse
Integrated Regional Water Management Plan (IRWMP)
Joint Powers Authority (JPA)—two or more government agencies that have agreed to work together on projects of common interest
Local Agency Formation Commission (LAFCO)—its charter is to encourage orderly and efficient provision of services, including water, sewer and flood control
Megawatt-hour (MWh)—a unit of electrical consumption or usage
National Pollutant Discharge Elimination System (NPDES)
Reverse Osmosis (RO)—membrane separation desalination technique
Potable Water—water safe enough to drink and cook with, i.e., free from harmful pathogens and contaminants
Solar Desalination (SD)—alternative desalination technology using heat and/or photovoltaic energy from the sun
State Water Project (SWP)—irrigation project managed by State of California
Tertiary Treatment—advanced treatment (following secondary treatment) that produces higher quality water with essentially all suspended matter removed, and (usually) some reduction in nutrient content
Title 22 Recycled Water—treated wastewater suitable for industrial or agricultural reuse, but not potable quality
Total Dissolved Solids (TDS)—dissolved salt or mineral constituents in water
Wheeling—allowing someone else's water to be moved (either notionally or actually) through your transmission system into the users system; usually for a fee

BACKGROUND

But for the drought, much less attention would have been paid to California's Water Action Plan (known as the 20x2020 Plan). This plan calls for a permanent 20 percent reduction in water use. The Plan uses 2005 as its base year, and will "consider recycling as a means to achieve [the reduction]." It emphasizes that "it is essential for California to expand the use of recycled water." The published plans for both Contra Costa Water District (CCWD) and East Bay Municipal Utilities District (EBMUD) also propose increases in water recycling.

As the drought continued through the summer and fall of 2015, news accounts brought the public's attention to the potential for treating more wastewater to the "tertiary level" and recycling (redirecting) it for industrial and irrigation needs. Some wastewater districts serving Contra Costa are already providing recycled wastewater to industrial, commercial, and municipal users, but further use of this resource is being slowed by a combination of financial and anticipated legal obstacles.

This inquiry focuses on opportunities for expanding water recycling and recovery of our existing local water resources. It also explores how obstacles to these goals may be overcome.

As a drought or regional water shortage progresses, there is a hierarchy of choices to be made. These include:

1. *Conservation* – It is the easiest and least costly to quickly implement.
2. *Recycling of wastewater* – It is the next least costly and disruptive. Wastewater is close to the users' service area, but requires further treatment to make it useable and a distribution infrastructure to deliver it to customers.
3. *Stormwater* – It is only intermittently available but infrastructure must also exist for its capture, storage, and distribution. The reliability and practicality of this resource is both site and climate specific. It was, however, an integral factor in helping Australia through its 10 year-long drought.
4. *Desalination* – It is usually the most expensive, environmentally disruptive, and energy intensive.

In the most severe situations, all four approaches are required.

What the Experts Are Saying –

At the January 2016 Water 2.0 Conference in Sacramento, John Laird, State Secretary of Natural Resources, made some pointed observations:

- California's population is expected to grow by 25 percent over the next generation thus increasing the demand for water.
- Our water infrastructure was designed for a climate that no longer exists.

- We need to build an infrastructure that will match the new climate reality.
- Water conservation works only if you have a reliable underlying water supply.
- While the public wants to believe that if you invest more you will get more of what you invest in (water), the reality may be that you are only protecting the limited supply you currently have (or possibly even less than you currently have).
- Given the facts above, the public needs to be kept informed so that they understand the reality and are on-board when decisions are made.

At the same conference, Felicia Marcus, the Chair of the State Water Resources Control Board, commented that:

- Low interest (1 percent) state revolving-fund loans are available for recycled water and stormwater projects.
- Recycling and stormwater capture projects are also eligible for Proposition 1 matching dollars.
- The Water Board's internal priorities are: permit streamlining (to speed the approval process for new projects), groundwater recharge regulations, and indirect potable reuse regulations.

These comments suggest that the State's regulators are reacting to both long-term and short-term water supply issues by encouraging local entities to take action. However, responsible local entities may not yet be ready to take these suggested steps.

History of Water Reuse—

In some areas of the country wastewater is already being purified and disinfected up to potable quality for reuse.³ The California Department of Water Resources (DWR) is currently drafting state-wide rules under which tertiary treated recycled water can be further purified before reintroduction (either indirectly or directly) into potable water systems. Definitive rules for "potable reuse" in California must be issued by the end of 2016.

California was once at the forefront of water recycling. In 1962, the Montebello Forebay Groundwater Recharge Project, a groundwater recharge project using recycled water, was inaugurated in Los Angeles County. More recently the Chino Desalter Authority came on line. That project, using collected stormwater to recharge the aquifer, extracts groundwater that was previously contaminated with nitrates, purifies it using Reverse

³ *Wichita Falls and El Paso (TX) are both involved in Direct Potable Reuse (DPR) projects.*

Osmosis (RO) technology, and sells the potable product to retail customers in nearby communities.

According to Laura Martin of *wateronline.com*, California has more groundwater recharge Indirect Potable Reuse (IPR) projects than any other state. The DWR has reviewed and approved each of these projects. Locally there are two RO plants in Alameda County and one in Santa Clara County that treat groundwater to potable quality. In 2008-2009, several Bay Area water districts cooperated in an experimental RO Plant at Mallard Slough to verify costs and feasibility of desalinating brackish river water. The plant demonstrated its feasibility but was later removed because it was not economically viable. Although the calculated cost of the potable water was roughly \$1000/acre-foot, it could not compete with \$600/acre-foot Central Valley Project water.

Twenty years ago, EBMUD and Dublin San Ramon Services District (DSRSD) formed a Joint Powers Authority (JPA) to distribute recycled water to supplement the water supply during the dry summer months. The partnership built a tertiary treatment plant and a "trunk line" to distribute the recycled water. DSRSD personnel operate the plant, and together with EBMUD share in the JPA's operating expenses. They distribute the recycled water primarily to commercial water customers who use the recycled water for irrigation (in lieu of less available potable water). Both EBMUD and DSRSD benefit through this partnership: DSRSD reduces the amount of wastewater it would otherwise have to pump into the San Francisco Bay, and EBMUD benefits from not having to supply more valuable drinking water for irrigation purposes.

DISCUSSION

Water Recyclers and Existing Customers –

Statewide, urban water agencies currently recycle about a third of potentially recyclable water – 300,000 acre-feet per year (afy) of 900,000 afy. In Contra Costa County, seven wastewater treatment plants are producing recyclable water (Title 22 quality) suitable for use outside their plants for industrial and irrigation purposes. The majority of this water is supplied to two power plants in Pittsburg and an oil refinery in Richmond. Golf courses, public parks, public school landscaping, and median strips use almost all of the balance. Dust suppression at concrete batch plants and public filling stations also use the remaining small fraction. Table 1 summarizes the suppliers and the recycled amounts. Currently, almost 25 percent of wastewater is recycled during the peak summer months. This is slightly lower than the state-wide average; however, all this water is non-potable quality – thus is underutilized during winter months, when it is not needed for irrigation.

Table 1 – Suppliers and Users of Recycled Water in Contra Costa County
(Most to least)

Treatment Plant	Effluent Treated, (Average Dry Weather Flow), mgd	Outside Plant Use, mgd	Comments Million Gallons per Day = mgd
Central San (CCCSD)	30	2.9 (available) 0.6 (used)	0.6 mgd committed to Zones 1 & 2 plus Fill Station
Delta Diablo	12.8	7.3	During hottest summer days 100% to Calpine, purple pipe irrigation, and public "Fill Station"
West County SD	6.5	5.8	Essentially 100% of capacity is spoken for by Chevron
City of Richmond	6.03	0	Discharged to the Bay; effluent is too salty for recycling
Pinole/Hercules	3.5	0	Discharged to Bay
City of Brentwood	3.2	0.5	Purple pipe to golf courses and parks; also "Fill Station"
Ironhouse SD	2.26	1.0	Ag application; the rest goes into river
Discovery Bay CSD	1.8	0.6	Local irrigation
Dublin San Ramon SD	1.6 (from Contra Costa)	1.5 (returned to Contra Costa)	Purple pipe to golf courses and parks; also "Fill Stations"
Mt. View SD	1.25	0	100% is being fed into a marsh for wildlife habitat
Rodeo SD	1.14	0.01	Minor amount for in-plant landscape
Crockett CSD	0.93	0	Discharged to Bay
Byron SD	0.1	0	Discharged to Marsh Creek
TOTALS	71.11	17.31	Average = 24.3%*

* This is the annual average. The percent recycled increases in hot summer months and decreases in winter months.

Potential Recyclers and Potential Customers –

There are 13 wastewater treatment plants serving the County. Also, there are several industrial sites that treat and then discharge their internally generated wastewater

directly into the Delta or the Bay. If some of this discharged water was further treated, it could be reused at the industrial sites instead of discharged. This would lower these sites' demand for higher quality outside water. However, it is unclear if this plan is currently economically viable.

Central Contra Costa Sanitary District (CCCSD) has the greatest potential capacity to recycle water. Even so, its ability to process Title 22 quality water for export is currently limited to roughly 3 mgd. To increase its capacity CCCSD would need to construct additional filtration units and related infrastructure. Industrial customers (Shell Martinez, and Tesoro Golden Eagle refineries) would be potential users of any such recycled water. Apart from industrial users, CCCSD is expanding its system for distributing recycled water to local golf courses. Table 2 summarizes the players, potential quantities available for reuse, and the potential needs. There are other smaller projects that would use on-site or satellite treatment plants to “harvest” a portion of the wastewater stream for golf course irrigation, before sending the balance on to the main treatment plant. Cost would be borne by the user.

Table 2 – Potential or Planned Recycled Water Projects

Treatment Plant	Customer/Project	Quantity Required, mgd	Timeline and/or Comments
CCCSD	Shell Martinez (cooling, process and boiler make-up water)	10	2020 and beyond – insufficient treatment capacity currently exists to supply full demand
CCCSD	Tesoro Avon (cooling, process and boiler make-up water)	10	2020 and beyond – insufficient treatment capacity currently exists to supply full demand
CCCSD	Concord Naval Weapons Station Redevelopment (residential and commercial)	2.5	2020 and beyond – treatment capacity currently exists to supply full demand
EBMUD (partner/w Pinole and/or Rodeo SD)	Phillips 66 Rodeo	2.8 (Phase 1) 0.9 (Phase 2)	Purchase agreement would have to be negotiated and a dedicated treatment plant built.
DSRSD-EBMUD	San Ramon Valley, Phase 2	0.43	Expansion of system to Bishop Ranch – 2017

The County is below the statewide average of 33 percent recycled water use. To reach “average”, customers in the County must use an additional 6.2 mgd of recycled water. (The County’s 2005-2020 General Plan includes a policy to “encourage the construction

of wastewater disposal systems designed to reclaim and re-use treated wastewater...”). DSRSD and EBMUD will start construction in 2017 on Phase 2 of the San Ramon Valley Recycled Water Project, which will add 3.6 miles of recycled water pipeline to connect Bishop Ranch Business Park to the distribution system. However, the project is only expected to add 0.43 mgd of recycled water usage.

The Water Suppliers –

EBMUD has two dams on the Mokelumne River plus several local reservoirs in the County. It also has an option to buy water from Yolo County during drought years and an intake structure (Freeport) on the Sacramento River to route that water to its existing aqueducts. Additionally, EBMUD is studying “groundwater banking” with San Joaquin County water authorities. This involves intentionally flooding farm land during the winter months to increase percolation into the aquifer for later use. EBMUD plans to increase its use of recycled water by 20 mgd over the next 25 years.

CCWD has rights to use up to 195,000 afy of Central Valley Project (CVP) water.

The “rights” are administered by the U.S. Bureau of Reclamation and can be reduced or curtailed in drought years. In addition, CCWD has a drought year agreement with East Contra Costa Irrigation District (ECCID) to option its 1914 senior surface water rights. It also has Los Vaqueros Reservoir (current capacity 160,000 acre-feet) to help buffer the impact of multiyear droughts. CCWD recently completed a “wheeling” agreement with EBMUD, which allows it to take its CVP water at the Freeport intake structure when capacity is available, rather than from its existing facilities on the San Joaquin River.

CCWD’s 10 Year Capital Improvement Plan mentions recycling, but lacks details about specific projects. The page in the Plan that mentions recycling states that any recycling project will *be equally funded by grants and untreated water rates*. Approximately ten percent of CCWD’s current water demands are met with recycled water supplied by others under various Memoranda of Understanding. CCWD plays no direct role in supplying the recycled water to customers.

DSRSD gets its water from Alameda County Zone 7 Water District. The wholesale price of \$1300/acre-foot is passed directly through to DSRSD’s customers as part of the total water bill. It also treats wastewater to Title 22 quality and distributes it via its recycled water pipeline to larger users. DSRSD is entirely dependent on Zone 7 for its fresh water supply, and Zone 7 is heavily reliant on the State Water Project (Lake Oroville) for its water.

The remaining water purveyors in the County rely on water from CCWD in whole or in part or rely exclusively on groundwater wells to meet their customers’ needs. The major water suppliers in the greater Bay Area are becoming more connected through the use of inter-ties and agreements to wheel water to meet emergency situations or when conveyance capacity is available.

Where the County Government Fits in –

The County's General Plan contains a broad principle (under section 8-d) that encourages that wastewater disposal systems be designed to reclaim and reuse treated wastewater. Beyond that, there is no explanation in the Plan on the actions the County will take.

The County interfaces with the various water and wastewater districts through the Board of Supervisors' Transportation, Water and Infrastructure Committee (TWIC). Contra Costa LAFCO, an independent agency with countywide jurisdiction, also interacts with these districts. Both receive periodic reports from the districts on their plans and activities. LAFCO has the additional responsibility of managing boundary issues and periodically assessing the financial stability of each district. The County and LAFCO have not assigned personnel to act as a watchdog or play a facilitator role in the areas of recycled or reused water.

Obstacles to Overcome for Recycled Water Projects –

Before any recycled water project can be implemented, issues related to cost, operations, water quality, customer base, regulatory and legal compliance, financing and timing must be addressed. Additional obstacles are the need to obtain consent from the water supplier and the perception on the part of the water suppliers that their water rights and allocations might be impaired.

Projects Worth Pursuing –

RMC Water and Environment recently completed a recycled water study for CCCSD.⁴ Among other options, the study considered adding 20 mgd tertiary treatment and ammonia removal capacity. Under this option, a 42-inch diameter pipeline would connect the Shell and Tesoro oil refineries to supply cleaned wastewater for cooling towers and for refinery process water. As a result, an equivalent quantity of CCWD fresh water would be "freed up" for other uses. The estimated cost to add capacity and treat the recycled water is \$820/acre-foot (\pm 30%). While this figure is higher than the \$650/acre-foot CCWD currently charges wholesale customers for raw canal water, it is anticipated that some customers would be willing to pay more for a secure supply.

With the expansion of its Los Vaqueros Reservoir, CCWD will be able to "bank" some of the newly available water and offer it to other regional water districts, like DSRSD. DSRSD and their water supplier, Alameda County Zone 7, both need additional water to support a growing customer base. After the expansion is completed, CCWD could potentially wheel the water via the proposed Transfer-Bethany-Pipeline to the South Bay Aqueduct, which connects to Alameda Zone 7's system. The responsible parties would need to negotiate the terms of such a project, including its financing, the water

⁴ CCCSD's *RECYCLED WATER WHOLESAL OPPORTUNITIES* – March 2016 – prepared by RMC Water and Environment

recipients, the price per acre-foot, and operation and ownership of the equipment and infrastructure. One mechanism to move such a project forward would be for the parties to enter into a JPA.

Other potential projects are small scale IPR projects. For example, DSRSD is studying injection and recovery wells as a means of fully utilizing its current recycled water capacity. CCCSD also has a capacity surplus of Title 22 quality water. That water could be treated to IPR quality and used for an injection and recovery well demonstration project with CCWD.

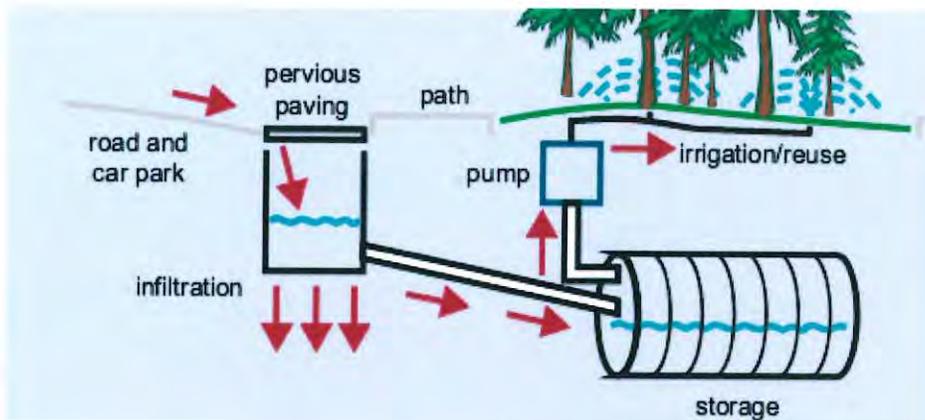
Stormwater Capture and Reuse –

The National Resources Defense Council (NRDC) recently graded California “D” in stormwater capture and reuse. Southern California, however, is aiming to increase its efforts in this area, with an ultimate goal of meeting at least ten percent of its total water needs from this source. According to the NRDC “capturing urban stormwater runoff in Southern California and the SF Bay Area could increase the water supply by as much as 630,000 afy while reducing a leading cause of surface water pollution.” The City and County of San Francisco is also actively addressing capture and reuse of urban runoff. They recently passed ordinances mandating that new commercial buildings over a certain size must recover both gray water and stormwater for reuse on premises. This approach is most likely to yield significant benefits in high-density urban areas.

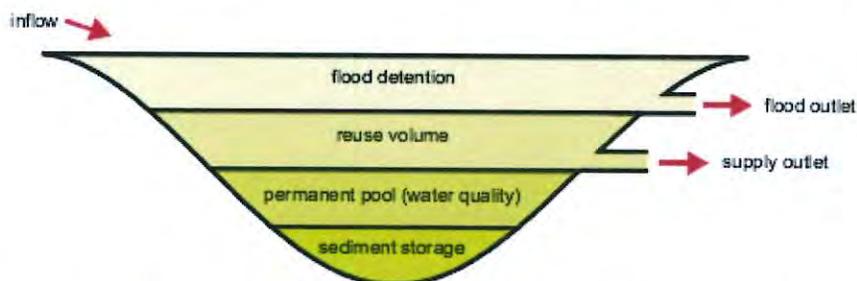
The Public Policy Institute of California lobbied for reforms to State Propositions 218, 26, and 13 to exempt water-related projects from the two-thirds majority vote requirement for new assessments, fees, charges or special taxes. The court in *Griffith v. Pajaro Valley* (2013) found that fees charged by water agencies, including flood control districts, for projects related to water or sewer services are exempt from the two-thirds majority voting requirement under Proposition 218. Thus, fees can be assessed for projects relating to capture and reuse without a two-thirds majority vote. As this remains a contentious issue, flood control districts are reluctant to go forward with capture and reuse projects until case law has been further established.

The Watershed Atlas of Contra Costa identifies 16 specific watersheds comprising roughly 513,280 acres. Assuming that future rainfall only averages 12 inches per year and that half of that rainfall soaks into the exposed soil, the remaining runoff still adds up to over 250,000 afy of locally available water. If only half of the runoff was captured, it would exceed the amount currently supplied by CCWD to its 500,000 customers. However, projects to maximize stormwater capture have not yet been identified in the County.

Australia is a leader in implementing innovative systems for stormwater capture. Two schematics for surface stormwater capture and underground storage systems are shown:



Underground Storage Scheme (NSW Dept. of Environ. & Conservation-2006)



Surface Swale Scheme (NSW Dept. of Environ. & Conservation-2006)

Various “water-advocates” agree that regional self-reliance and multi-benefit solutions are keys in achieving a sustainable, reliable water infrastructure. The focus on stormwater management by the County and its nineteen cities relates almost exclusively to compliance with NPDES stormwater discharge permits. These municipalities do not have plans for capturing stormwater for beneficial use, except to the extent that it promotes retention of pollutants that might otherwise be released into the San Francisco Bay or Delta.

The storage capacities of groundwater basins in the County have not yet been quantified. Even if significant (tens of thousands of acre-feet) storage capacity were identified, well drilling data collected by US Geological Service and California DWR suggest that augmented recharging could be difficult. Contra Costa’s basins have layers of impermeable and low permeability clays that slow percolation, thus natural percolation from the surface is limited in many areas. Additionally, geological faults impede the flow of groundwater from one area to another.

Desalination Options –

The most prevalent technology for desalination, Reverse Osmosis (RO), involves forcing water molecules through filtering membranes at high pressure to remove salts

and other impurities. Sea water systems require 2 cycles (stages) to produce fresh water. Brackish water requires only one cycle to produce fresh water and, thus, is a less expensive source than sea water. The process is slightly more efficient when the inlet water is warmer.

A large sea water desalination plant was just completed in Carlsbad, CA, which is producing fresh water for approximately \$2200 to \$2400/acre-foot. Recent RMC estimates for producing DPR quality water from wastewater supplied by CCCSD ranged from \$2200 to \$2300/acre-foot, a cost that is on a par with sea water desalination, but higher than brackish water desalination. This suggests that in certain scenarios brackish water desalination might be a less costly option than recycling wastewater up to potable quality.



Bank of Desalination Membrane Filtering Tubes

RO is considered to be a “mature” technology, meaning it is unlikely that there will be breakthroughs in the near future that will drive either construction or operating costs down. According to the California Energy Commission in 1980 it took 36 MWh of electricity to produce one acre-foot of desalinated water. Currently only 3.5 MWh is needed – which is roughly fifty percent energy efficiency – extremely good for an industrial process. By comparison, almost the same amount of energy is needed to import an equal quantity of surface water to Los Angeles and San Diego from the Colorado River.

At least two emerging technologies may place less demand on the electric grid in the future: solar desalination (SD) and humidification dehumidification (HDH) desalination. The former uses solar concentrators and panels to produce fresh water and salt cake

from brackish water. The latter is designed to use waste-heat (hot air) to promote evaporation on one side of a heat transfer surface and condensation of fresh water on the other. “Dewvaporization” is one variation of the HDH process. It uses a common heat transfer surface and is theoretically even more energy efficient. Although pilot plants have been tested with both methods, thus far there is little interest in taking the next step to an industrial scale operation. Appendix 2 contains a discussion of other desalination options.

The U.S. Bureau of Reclamation funded an HDH pilot plant. One of the goals for the project was to “develop methods to make desalting more efficient through promotion of dual-use facilities in which waste energy could be applied to desalting water.” The 5,000 gallons/day pilot plant is located at a wastewater treatment plant near Phoenix, Arizona. The HDH process uses low-grade heat and waste heat to promote evaporation of the wastewater stream. A similar plant could be built at CCCSD. It uses natural gas from the adjacent landfill as fuel for drying its treated solid waste; thus, waste heat should be available for an HDH desalination plant.

Regardless which technology is selected, water professionals believe that desalination plants will ultimately be part of the water reliability solution. In addition to treating water from the San Francisco Bay and the Delta, they also can upgrade groundwater that contains a high level of total dissolved solids (TDS). Such water is currently blended with higher quality surface water, limiting the amount that can be used.

The California Legislature is considering allowing “surplus” solar power to be used for desalination projects at below market price. This would make such projects an even more attractive alternative.

The Cost of Doing Nothing –

If nothing is done, the result may be higher rates for less water. While some environmentalists view this as a “least worst” outcome that will rein-in wasteful practices and minimize environmental impacts, there are disadvantages:

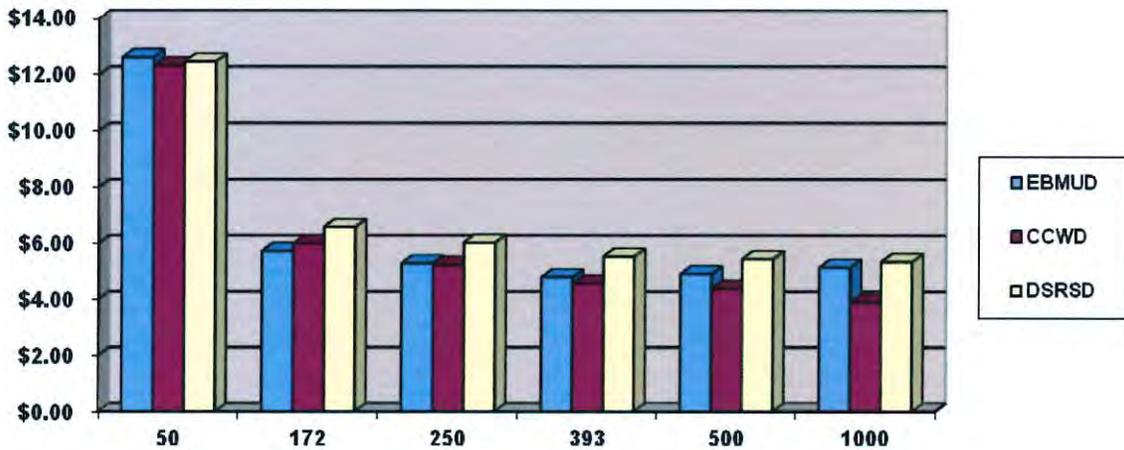
- It adversely affects lifestyle choices, such as: outdoor pools, home gardens and orchards, and landscaping
- It discourages new industries that need water to operate their businesses from locating here
- It leaves the County’s residents at the mercy of the weather and reliant on stored water reserves

If water conservation is the only approach used, customers could end up paying almost as much each billing cycle while using less water. On the other hand, if the water shortage is approached using a combination of water conservation and water treatment, customers may ultimately pay less than water conservation alone. This is because a

water supplier can increase its profitability by providing treated water to its customers. Increasing the amount of water delivered generally does not increase a water supplier's fixed costs and can help to cover those costs. The fixed costs come from debt financing of infrastructure that must be paid off (such as the Los Vaqueros Reservoir and the Freeport Intake on the Sacramento River), employee salaries, and maintenance costs on equipment that must be kept in operation regardless of the amount of water passing through.

The bar chart (Table 3) illustrates conservation's unavoidable consequence: the first few gallons of water used become more expensive as total consumption decreases. This may seem counter-intuitive, given that the unit rates incorporated on tiered-rate water bills show progressively higher unit costs when the "life-line" quantity is exceeded. However, the reality is the fixed "service charge" is added on top of whatever amount of water is used.

Table 3 – Unit Cost Bar Chart



Vertical-axis = dollars/unit (748 gallons) based on a 61 day billing cycle
Horizontal-axis = average gallons per day over 61 day billing cycle

Water providers recently pointed out that water conservation has resulted in "drastic losses in revenue needed for infrastructure investments and fixed cost recovery (costs incurred regardless of amount of water used – representing about 70 percent of customer bills)." A recent Fitch Ratings survey revealed that 78 percent of municipal water agencies have already, or plan to, adjust rates to offset losses from mandatory conservation. Clearly the downside of conservation is that the retail customer will not be saving much money for using less water.

Final Observations –

- Water supplies are not growing, but population is.
- Desalination of brackish water (where available) needs to be revisited. Estimated costs are slightly lower than DPR quality water and public acceptance could be easier to gain.
- The estimated costs for IPR and DPR remain relatively high, even though the energy cost to operate the plants should be lower than desalination plants.
- Unless CCCSD can get a State or Federal grant to increase its capacity for recycled water, it cannot be cost competitive with raw canal water supplied by CCWD to their industrial customers.
- State matching grant money and low-interest loans are available for recycled water and desalination projects.
- Recycling Title 22-quality water to year-around customers has a better chance to maximize its use, provided willing customers can be signed up.
- Both mandated conservation and recycling water potentially reduce water purveyors' revenue resulting in upward pressure on billing rates.
- Stormwater should be part of the water sustainability solution – even though its expected contribution will be limited.
- The Board of Supervisors could (through a Task Force) be an effective facilitator in the formation of a recycled water JPA.
- The Board of Supervisors could (through an Advisory Council) be an effective facilitator in educating and encouraging the participation of the public.

FINDINGS

- F1. Among obstacles to using more recycled water are: determining who will pay for installing the necessary infrastructure and distribution system; finding a willing customer; and minimizing the financial and legal impacts to the current potable water purveyor.
- F2. Water purveyors and wastewater processors can share water treatment costs and revenues under a JPA.
- F3. State matching grants and low-interest loans are available for small indirect potable reuse projects, which could potentially increase water supply.
- F4. Indirect potable reuse projects are ideal for areas in the County where other new water sources are unavailable.
- F5. It is difficult to develop large recycled water projects without the cooperation and commitment of water purveyors and customers.
- F6. Where recycled water can be wheeled to one customer, it could “free up” an equivalent amount of fresh water that could then be wheeled to another customer who might be willing to pay more, thus creating “win-win” results for recycled water projects.
- F7. While stormwater capture and reuse has potential for contributing to the County’s long-term water needs, the County has focused on NPDES compliance.
- F8. Contra Costa County and its cities could adopt water saving and recycling ordinances for large commercial buildings, similar to those adopted in other large urban locations such as San Francisco.
- F9. Satellite wastewater treatment plants are feasible in situations where the user is distant from existing recycled water distribution systems, needs water for irrigation, and is able to meet the costs to build and operate the plant.
- F10. The County is below the State average in use of recycled water.
- F11. Desalination technology continues to evolve, including smaller scale solar powered and HDH (“Dewvaporation”) pilot plants, although neither has been developed to full commercialization.
- F12. Citizen involvement (possibly through an Advisory Council) is a key to getting buy-in for recycle and IPR/DPR projects because it is citizens who pay for, consume, and depend on a reliable source of pure water.
- F13. There is no single point of contact for water recycle and reuse issues in the County.

RECOMMENDATIONS

- R1. The Board of Supervisors should consider facilitating (possibly through a Task Force) the formation of a JPA to promote water recycling, stormwater capture and desalination projects.
- R2. CCCSD and CCWD should explore the feasibility of cooperatively developing an IPR Injection Well Project.
- R3. CCCSD, CCWD, and DSRSD should consider the formation of a JPA to expand CCCSD's tertiary treatment capacity in order to free up fresh water for domestic and commercial customers.
- R4. The Board of Supervisors should consider directing that priority be given to capture and reuse of stormwater where possible in all new County flood control projects.
- R5. The Board of Supervisors should consider adopting ordinances that promulgate recycling and recovery of water on a County-wide basis.
- R6. The city should consider adopting requirements relating to the use of reclaimed water for planned communities and large commercial buildings to maximize its use.
- R7. The district should consider facilitating the use of satellite wastewater treatment plants, where appropriate.
- R8. The Board of Supervisors should consider adopting a County goal to exceed the State average for recycled water use and establish a target date.
- R9. The County and Districts should consider meeting to discuss each District's need for land for demonstration of scaled-up recycling and desalination projects using green technologies, which may qualify for State grant money, and the County's ability to lease such land.
- R10. To promote public awareness and citizen involvement, the Board of Supervisors should consider establishing a citizen's "Water Reuse Advisory Council" which includes citizen stakeholders and technology experts to advise them on all water reuse issues affecting the County.
- R11. The Board of Supervisors should consider designating a single point of contact within County government for water recycle/reuse issues or establishing a permanent water sustainability subcommittee under their Transportation, Water and Infrastructure Committee to advise the committee on water reuse issues.

REQUIRED RESPONSES

	<u>Findings</u>	<u>Recommendations</u>
Contra Costa County Board of Supervisors	F1, F2, F7-F8, F10-F13	R1, R4, R5, R8-R11
Board of Directors for the Contra Costa Water District	F3-F6, F9	R2, R3, R7, R9
Board of Directors for the Central Contra Costa Sanitary District	F3-F6, F9	R2, R3, R7, R9
Board of Directors for the Dublin San Ramon Services District	F3-F6, F9	R2, R3, R7, R9
Board of Directors for the East Bay Municipal Utilities District	F9	R7, R9
Concord City Council	F8	R6
San Ramon City Council	F8	R6
Walnut Creek City Council	F8	R6

These responses must be provided in the format and by the date set forth in the cover letter that accompanies this report. An electronic copy of these responses in the form of a Word document should be sent by e-mail to epant@contracosta.courts.ca.gov and a hard (paper) copy should be sent to:

Civil Grand Jury – Foreperson

725 Court Street

P.O. Box 431

Martinez, CA 94553-0091

APPENDIX 1

METHODOLOGY

The Grand Jury surveyed a cross-section of wastewater treatment agencies; attended various public meetings at agencies, special districts, and boards; and conducted sixteen interviews with managers, technical specialists, and water industry consultants from:

- Cities that treat their own water and/or wastewater
- Contra Costa Central Sanitary District (CCCSD)
- Contra Costa Clean Water Program (CCCWP)
- Contra Costa Water District (CCWD)
- County Departments with responsibility for water-related issues
- Delta Diablo (DD) – formerly Delta Diablo Sanitary District
- Diablo Water District (DWD)
- Dublin San Ramon Services District (DSRSD)
- East Bay Municipal Utilities District (EBMUD)
- East Bay Leadership Conference – Water Task Force
- East Contra Costa County Integrated Regional Water Management (Plan)
- East County Water Management Association (ECWMA)
- Local Agency Formation Commission (LAFCO)
- San Francisco Bay Regional Water Quality Control Board (SFBRWQCB)

APPENDIX 2

OTHER DESALINATION OPTIONS–

The information below expands on some other technologies available for desalination. Electrodialysis and Forward Osmosis were not previously discussed in the report.

Electrodialysis (ED)–

ED is an ion exchange membrane process that uses electrical potential as a driving force to remove salts from brackish or sea water. Reportedly the process operates most efficiently with brackish water containing less than 3,000 TDS. This technology may be best suited to smaller projects. According to Lee and Moon (in *Desalination – Water from Water*), a 10,000 cubic meter capacity plant could produce desalinated water for \$0.83/m³ or about \$1024/acre-foot. However, brine disposal costs would have to be added.

Forward Osmosis (FO)–

FO is an osmotic process similar to reverse osmosis, but instead of a pressure gradient, it uses a higher concentration “draw” solution as the driving force to move water across a semi-permeable membrane. This produces a less concentrated solution on the draw side of the membrane from which the water must then be extracted. A pilot or demonstration plant was built by NASA Ames Research Laboratory recently. According to McCutcheon and Bui, (in *Desalination – Water from Water*), “FO promises to enable low cost desalination with improved recovery and fouling resistance...” For wastewater treatment it could be “hybridized” with existing RO units. In this scenario it would act as a pre-filter to skim out the water from an otherwise unprocessed waste stream.

ADDITIONAL REFERENCES AND SUGGESTED READING–

Water 4.0: the Past, Present and Future of the World’s Most Valuable Resource, David Sedlak; (Yale University Press: New Haven, CT), 2014

Desalination – Water from Water, Jane Kucera, Editor; (Scrivener Publishing: Beverley, MA), 2014

Desalination with a Grain of Salt – A California Perspective, Heather Cooley, Peter H. Gleick, and Gary Wolff; (Pacific Institute: Oakland, CA), June 2006

Desalination Engineering: Planning and Design, Nikolay Voutchkov; (McGraw-Hill: New York, NY), 2007

August 2, 2016

By U.S. Mail and email (epant@contracosta.courts.ca.gov)

Mr. Michael Simmons, Foreperson
Contra Costa Civil Grand Jury
725 Court Street
P.O. Box 431
Martinez, CA 94553-0091

Re: City of Concord Response to May 24, 2016 Grand Jury Report No. 1606, “Reclaiming our Water – More Complicated than it Might Appear”

Dear Mr. Simmons:

This letter serves as the City of Concord’s response to the Contra Costa County Grand Jury’s findings and recommendations set forth in Report No. 1606, entitled “Reclaiming our Water – More Complicated than it Might Appear.” This letter was reviewed by the Concord City Council at its August 2, 2016 City Council Meeting, and I was directed to submit the response for the City of Concord.

I. FINDINGS

Finding No. 8: Contra Costa County and its cities could adopt water saving and recycling ordinances for large commercial buildings, similar to those adopted in other large urban locations such as San Francisco.

Response to Finding No. 8: The City of Concord agrees with this finding.

II. RECOMMENDATIONS

Recommendation No. 6: The city should consider adopting requirements relating to the use of reclaimed water for planned communities and large commercial buildings to maximize its use.

Response to Recommendation No. 6: The recommendation has been implemented. The following summary describes the implementation requirements related to planned communities (Concord Reuse Project Area) and for large commercial buildings within the

existing developed areas of Concord where recycled water is available, primarily the Diamond Boulevard area.

Summary: The Concord Reuse Project Area Plan (Book 2 –Technical Chapter 5.5 Recycled Water) includes provisions for a reclaimed water system that will be planned and implemented for the entire 2,000 + acre planned development area “to reduce total water demand and avoid the need to use drinking water for irrigation and other non-potable purposes.”

The following Reclaimed Water Principle and Policies are included in the Concord Reuse Project Area Plan:

Principle U-4: Reduce the use of potable water for non-potable purposes by providing a reclaimed water system serving the Los Medanos Area (Reuse Project Developed Area).

Policy U-4.1: Reclaimed Water Quality

Ensure that recycled water complies with all applicable health and safety standards and other pertinent water quality regulations.

Policy U-4.2: Reclaimed Water Use

Use reclaimed water as the primary water supply for residential and commercial landscape irrigation, building cooling, and all other applications with the Los Medanos Area, where potable water is not essential. Prohibit use of potable water for irrigation unless there are not alternative supply sources.

Policy U-4.3: Water System Design Flexibility

Design buildings and irrigation systems to accommodate future use of reclaimed water in the event that reclaimed water is not available at the time of construction.

Policy U-4.4: Purple Pipe

Require developers to install “purple pipe” in outdoor irrigation systems throughout the Planning Area to maximize the potential future use of recycled water.

In August 2009, the Central Contra Costa Sanitary District (CCCSD) provided a “Will Serve” letter to the City of Concord indicating its commitment to be the supplier of reclaimed water. The Letter acknowledges that the precise amount of reclaimed water has yet to be determined, but cites the CCCSD’s ability and intent to provide up to 6,000 acre-fee per year. The State Water Resources Control Board has granted CCCSD the authority to provide up to 26,120 acre feet of recycled water per year for irrigation and industrial purposes throughout its service area.

Delivery of recycled water to the Reuse Project Area would require construction of a pipeline connecting CCCSD’s treatment facility to the site. A reservoir or other containment facility

could be required within the Planning Area. Expansion and renovation of CCCSD's tertiary treatment facility would also be required. The specific needs and associated costs for recycled water facilities would be determined through upcoming Specific Planning activities for the Phase 1 Development at the base and will be incorporated into project-level development approvals.

New reclaimed water distribution lines ("purple pipe") and pumping stations also will be required to service the new development. These facilities will allow reclaimed water to be used for parks, recreational facilities and various residential and commercial purposes.

In addition, recycled water is currently available from CCCSD to private properties along Diamond Boulevard in Concord. Recycled water is currently used for irrigation and other non-potable uses by a number of large businesses along Diamond Boulevard, including the Concord Hilton and the recently constructed Buffalo Wild Wings retail development. Recycled water facilities will be incorporated into the new 300,000 square foot Veranda shopping center on Diamond Blvd. that was formerly the site of the Chevron office facility.

Victoria Walker, Director of Community and Economic Development, is available to answer any questions or provide any additional information concerning the above responses or enclosed documents. You can reach her at (925) 671-3434 or by email at victoria.walker@cityofconcord.org.

Sincerely,

Valerie J. Barone
City Manager



June 24, 2016

RECEIVED

JUN 29 2016

CITY MGR'S. OFFICE

Mayor Laura M. Hoffmeister
City of Concord
1950 Parkside Drive, MS/01
Concord, CA 94519

Dear Ms. Hoffmeister:

Attached is a copy of Grand Jury Report No. 1615, "Truancy and Chronic Absence in Contra Costa County Schools?" by the 2015-2016 Contra Costa Grand Jury.

In accordance with California Penal Code Section 933.05, this report is being provided to you at least two working days before it is released publicly.

In accordance with Section 933.05(a), the responding person or entity shall report one of the following actions in respect to each finding:

- (1) The respondent agrees with the finding.
- (2) The respondent disagrees with the finding.
- (3) The respondent partially disagrees with the finding.

In the cases of both (2) and (3) above, the respondent shall specify the portion of the finding that is disputed, and shall include an explanation of the reasons thereof.

In addition, Section 933.05(b) requires that the respondent reply to each recommendation by stating one of the following actions:

- 1. The recommendation has been implemented, with a summary describing the implemented action.
- 2. The recommendation has not yet been implemented, but will be implemented in the future, with a time frame for implementation.
- 3. The recommendation requires further analysis. This response should explain the scope and parameters of the analysis or study, and a time frame for the matter to be prepared for discussion. This time frame shall not exceed six months from the date of the publication of the Grand Jury Report.
- 4. The recommendation will not be implemented because it is not warranted or is not reasonable, with an explanation thereof.

Please be aware that Section 933.05 specifies that no officer, agency, department or governing body of a public agency shall disclose any contents of the report prior to its public release. Please ensure that your response to the above noted Grand Jury report includes the mandated items. We will expect your response, using the form described by the quoted Government Code, no later than **September 30, 2016**.

Please send a copy of your response in hard copy to the Grand Jury, as well as a copy by e-mail in Word to epant@contracosta.courts.ca.gov.

Please confirm receipt by responding via e-mail to epant@contracosta.courts.ca.gov.

Sincerely,

Michael Simmons, Foreperson
2015-2016 Contra Costa County Civil Grand Jury

**A REPORT BY
THE 2015-2016 CONTRA COSTA COUNTY GRAND JURY
725 Court Street
Martinez, California 94553**

Report 1615

**TRUANCY AND CHRONIC ABSENCE
IN CONTRA COSTA COUNTY
SCHOOLS**

Empty Desks = Empty Futures + Full Prisons + Big Dollar Losses

APPROVED BY THE GRAND JURY:

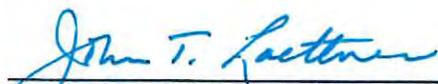
Date: 6/14/16



MICHAEL SIMMONS
GRAND JURY FOREPERSON

ACCEPTED FOR FILING:

Date: 6/15/16



JOHN T. LAETTNER
JUDGE OF THE SUPERIOR COURT

Contra Costa County Grand Jury Report 1615

Truancy and Chronic Absence in Contra Costa County Schools

Empty Desks = Empty Futures + Full Prisons + Big Dollar Losses

TO: Contra Costa County Office of Education; District School Boards for Acalanes Union High, Antioch Unified, Brentwood Union, Byron Union, Canyon, John Swett Unified, Knightsen Elementary, Lafayette, Liberty Union High, Martinez Unified, Moraga, Mt. Diablo Unified, Oakley Union Elementary, Orinda Union, Pittsburg Unified, San Ramon Valley Unified, Walnut Creek, and West Contra Costa Unified; City Councils of Antioch, Brentwood, Clayton, Concord, Danville, El Cerrito, Hercules, Lafayette, Martinez, Moraga, Oakley, Orinda, Pinole, Pleasant Hill, Pittsburg, Richmond, San Pablo, San Ramon, Walnut Creek

SUMMARY

Every school day, thousands of students across Contra Costa County (County) are absent from school. Based on truancy rates in the 2014-2015 school year, the public schools in Contra Costa County were ranked among the worst, 46th of 58 California counties. Out of 180,000 students in the County, 10,000 of them had at least three unexcused absences during the school year—the definition of “truancy”. Those who were “chronically absent”—that is, absent for any reason 10 percent or more of the school year, were an even larger number.

Elementary schools in the County also ranked last out of nine local counties in the truancy rate, with a truancy rate of 28.6 percent. This bodes poorly for our future correction of the problem as most of these elementary truants develop poor attendance habits for the rest of their school lives.

These empty school desks have deep social and fiscal impacts on Contra Costa County. For example, 83 percent of chronically absent students in kindergarten and 1st grade are unable to read at grade level by 3rd grade, and are four times more likely to drop out before high school graduation. Furthermore, 80 percent of the young adults in the justice system were truant or chronically absent students. Their detention in the legal system now costs the County millions of dollars.

Additionally, chronic absenteeism causes a severe loss of funding to the schools. The State reimburses schools based on a formula heavily weighted to the attendance of each student. The County lost over \$36 million in school funding in the 2014-2015 school year due to students absent from school. This funding loss not only affects those students who are absent, but also reduces funding for the rest of the students, and deprives the County of needed money for deserving school programs.

Students missing from school not only miss gaining an education, they also miss learning important life/work skills. Chronic absence from school has links to other negative consequences for the County, including increased daytime crime, unemployment, higher prison populations, and increased social service costs that drain County resources. Young people lacking a high school diploma face much higher odds of life as a County dependent rather than as a positive contributor to the community.

This report discusses the fundamental reasons for truancy and chronic absenteeism from school. We outline current anti-truancy programs and what needs to be done in the future to better address the problem.

Simply put, the missing student is both the problem and the answer. Solve why the student is absent and find the means and resources to help them stay in school. Increased student attendance means more funding to the district so any modest improvement pays the district back with increased revenue and student achievement.

In short, this report emphasizes the need to invest in our children now and help give them a future, or pay for it later with lower graduation rates, higher prison populations, and social service costs to last a lifetime. If we fail these students, we also fail ourselves.

METHODOLOGY

The Grand Jury conducted an eight-month investigation, consisting of interviews, individual school district surveys, and research.

Those interviewed included the following:

- County School officials;
- School District administrators;
- Law enforcement officials;
- Local family counseling agencies who assist students with attendance issues
- Nationwide Non-Government Organizations (NGOs) that work on attendance initiatives and grant funding;
- Local NGOs, who are in partnership with the County to improve attendance rates in our schools and provide educational programs for struggling students;

Research materials included the following:

- California Attorney General's 2013, 2014 & 2015 Report on California's Elementary School Truancy & Absenteeism Crisis – "In School + On Track 2015"
- California Department of Education (CDE) data
- Review of current attendance programs and successful attendance tracking tools
- Past Grand Jury reports from other counties
- "Truancy and Schools" by Ken Reid
- 1999 KidsData.com (a national resource for information and statistics about kids in the County)
- Program materials from "Attendance Works", a nationwide initiative to promote best practices for increasing school attendance

The Grand Jury also attended truancy and parent court proceedings.

BACKGROUND

Nationwide studies show that as many as 7.5 million students are chronically absent from school each year. In California, one in five elementary school students are truant based on data from the California Department of Education. Furthermore, a report published by the California State Attorney General, Kamala Harris, *In School + On Track 2015*, estimates that statewide, 8 percent of elementary school students are chronically absent.

There is an important difference between "truancy," which is an unexcused absence covering more than three days in a school year, and "chronically absent," which means any absence, whatever the reason, that covers more than 10 percent of the school year, or roughly two days a month. Students who are chronically absent from school endanger their futures and sow seeds of future costs and problems for the County.

Time away from the classroom hurts a student's chances to succeed in life. Students who miss school may face lifelong economic consequences. Studies show that chronically absent students feed the school to prison pipeline. Over 80 percent of prison inmates were truant or chronically absent when they were students.

While success in school is dependent upon many factors, being present every day is critical, particularly for low-income students and minority students, who face a variety of educational barriers. Truancy and chronic absences is a distinct predictor of low student achievement and high school dropout rates.

Important warning signs can be seen as early as pre-K and kindergarten-age children who show a pattern of chronic absences. Studies show that this pattern predicts poor attendance and academic performance in later grades. Over 80 percent of chronically absent students in kindergarten and 1st grade are unable to read at grade level by the

3rd grade and are four times more likely to drop out than children who can read at grade level. By 6th grade, chronic absence is a leading indicator that a student will drop out of high school. By 9th grade, chronic absence is even a better predictor of dropout rates than 8th grade test scores.

Consequently, keeping children in school and learning at the earliest grade levels is key to creating good attendance habits and keeping students on pace with their classmates. Yet, many elementary students miss valuable learning time due to chronic absenteeism, and develop a damaging pattern that continues through later years.

DISCUSSION

The County school system consists of 18 school districts located from Richmond to San Ramon to Byron. Including, special education, charter schools, and continuation schools, there are approximately 180,000 students from kindergarten to 12th grade. Each year approximately 60,000 of these students are chronically absent and/or truant.

The County's school districts have a diverse economic and ethnic makeup. This diversity is reflected in truancy and student absentee rates. For example, the Richmond School District has the lowest per capita income levels in the County and the lowest attendance rate: approximately 62 percent. On the other hand, the San Ramon Valley School District has one of the highest per capita incomes and the highest attendance rate at 97 percent.

Not surprisingly, the State has given special financial assistance to low-income districts through the "Local Control Funding Formula" (LCFF) program. Most funds for school operations are no longer supplied from local property and sale taxes. Instead, the State funds education district-by-district using a system of identifying and funding triggers with a base funding level. There are funding boosts if the students live in a low-income school district or in a district with high numbers of English as second language (ESL) learners versus a more affluent district with relatively few ESL students. A key part of the funding formula for all districts, however, is average daily attendance (ADA) that must be tracked and reported to the State.

Given how schools are funded, financial loss to a school from chronic student absences can be severe. The cost of running a school is fixed. Teachers, administrators, janitors, maintenance workers, bus drivers must be paid regardless of the number of students that show up. Other fixed costs include building utilities and maintenance. Consequently, for both educational and fiscal reasons school administrators say, "Our goal is to make sure every student is in class and getting the education they deserve."

Weaknesses in the Current System for Improving Student Attendance

Despite the importance of tracking and promoting higher school attendance, complete and accurate data about schools' rates of chronic absenteeism does not exist. In the

absence of this information, other indicators, including truancy rates (which are reported), are used as proxies for the chronically absent rates. The focus of this report is “chronically absent” students who are missing more than 10 percent of the school year. Various studies show that in the County, similar to the state and nation, the students who are chronically absent from school are those most likely to fail to graduate, to enter the welfare rolls, or to wind up in prison. High “chronically absent” rates also have a severe financial impact on the County and its school districts. In 2015, Contra Costa County school districts lost an aggregate \$36,029,637 of State ADA funding solely because of the number of students absent from class.

Comparative data on truancy rates also reveal a disturbing picture for the County. The truancy rate for the County’s students exceeds the statewide truancy average and the average for nearby Alameda County. In fact, Contra Costa County ranked one of the worst, 46 out of 58 total counties in the State for their truancy rate in the 2014-2015 school year.

Truancy Rates 2014-2015 School Year	Percent of student population
California	31.1
Alameda County	27.0
Contra Costa County	38.9

There are many causes for truancy and chronic absences. Diverse and complex reasons make it difficult to create a one size fits all solution. Each student has a unique history and some need very personalized support or incentives to improve their attendance patterns. The most effective programs are those that take an early intervention and holistic approach that includes careful evaluation of each individual student, including his or her family circumstances, ethnic background, English language skills, physical or mental challenges and individual aptitude levels.

Personalized student programs of this kind and the needed support to facilitate them cost money and require passionate individuals who make attendance their priority. Personalized programs show the most promise of yielding results that can put a student on a better path to success in school, thereby lessening the probability that the student will one day become a future burden on the community.

However, implementing and maintaining successful programs to improve attendance is not easy. As one administrator put it, “there are so many tasks required of our teachers each day already” and another explained, “For decades a student’s attendance was taken, not tracked and evaluated.” In general, schools are dealing with many issues. Focusing on daily attendance patterns, prevention and awareness often competes with other priorities for funding and attention by school administrators. Such competing

priorities and limited resources are the biggest challenges to overcome in programs to improve student attendance rates.

Information Gaps Exist

While individual school districts in the County collect some data on chronically absent students, the districts are not required to report this data to a central office in a consistent format. That means the collected data is not aggregated and shared countywide. California is one of only four states in the nation that does not have a statewide attendance tracking system.

With the passage of the Local Control and Accountability Plan (LCAP), California Education Code section 15497, in 2013, each school district is now required to develop a goal-oriented local plan to improve district schools in eight priority areas, one of which is to promote student engagement to improve attendance rates. The plans are to be developed by teachers, parents, and others in the community. Although the introduction of the LCAP requirements appears to have led to some modest attendance improvements in the County, gaps still exist in the processes and infrastructure used by the school districts to improve student attendance rates. One of the key gaps is a lack of centralized and detailed data collection on chronic absence rates.

Without good data to reveal the depth of the problem, other key data indicators must be used to get a better understanding of the chronic absence problem. Each of these indicators has been linked, either positively or negatively, to chronic absence rates. These indicators are the following:

- High school graduation rates;
- Economically disadvantaged/advantaged locations;
- Students' academic achievement at grade level;
- Truancy and parent court statistics; and
- Existing programs- impact and success rates of improving attendance.

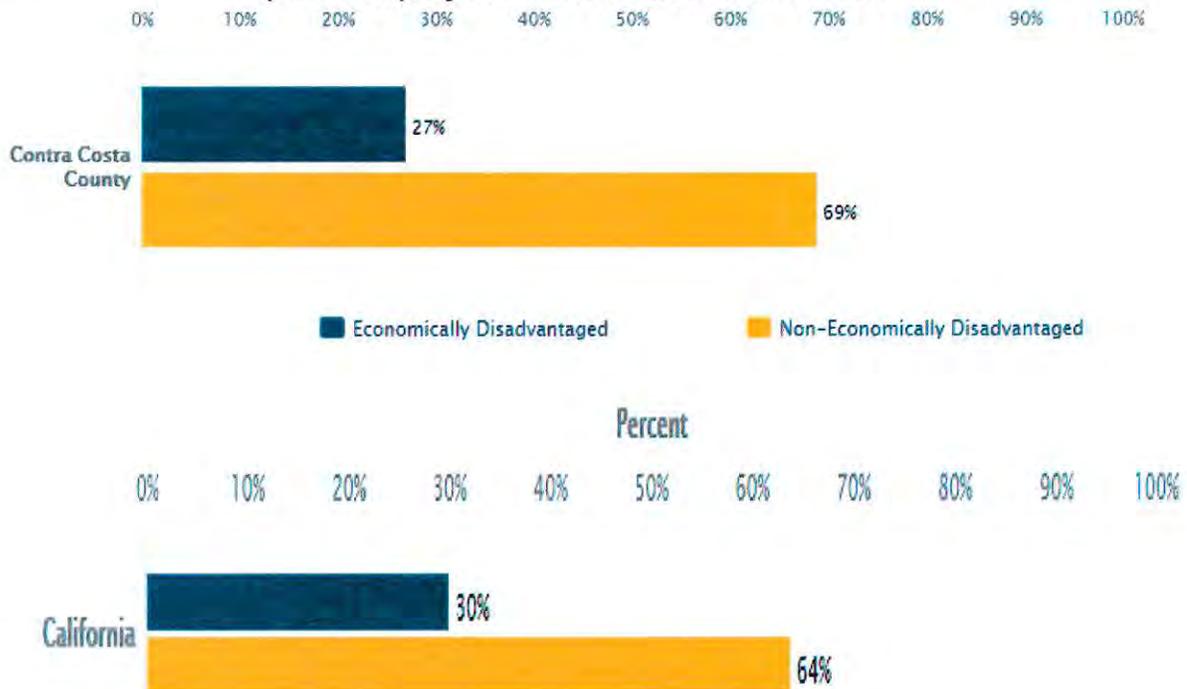
High school graduation is the benchmark, not only for an individual's future prosperity, but also for the prosperity of a county. In the County over 8 percent of 12th graders did not graduate last year. Data is not currently available to know how many of those non-graduates were chronically absent or truant. However, the law now requires school districts to collect and report this data.

Economically Disadvantaged Students

In certain school districts within the County, there are a significant number of families and students who struggle financially and are considered economically disadvantaged. The available data suggest that economically disadvantaged students are more likely to struggle with attendance since they face more challenges in getting their basic needs met. These students are at greater risk of being absent and not reading at their grade level in the early years.

The bar graph below shows that 73 percent of the economically disadvantaged students in the County are below the standard achievement rank for their grade level in English and Language Arts and are at risk for becoming dropouts. On the other hand, only 31 percent of the County's *non-economically disadvantaged* youth fail to meet the standard. In fact, the County's non-economically disadvantaged youth exceeded the state average for their peers in these same proficiency tests.

Students Meeting or Exceeding Grade-Level Standard in English Language Arts (CAASPP), by Socioeconomic Status: 2015



Chronic absences among economically- disadvantaged students are of particular concern because the patterns show they are likely to be struggling academically compared to their peers.

To address problems affecting students in economically disadvantaged districts, the State is now requiring school districts to report designated at-risk-student groups along with their ADA (Average Daily Attendance) reports. The State provides additional funding to districts based on the percentage of disadvantaged students who fall into the specified subgroups. Districts may use such additional funds for additional teachers, health programs, counseling, campus security, resource officers, and even meal assistance. This additional funding is provided through LCFF. More funding, of course, does not alone assure a solution to the chronic absence problem in the economically

disadvantaged districts. The key to improving the matter is applying such funds to the needs of each district. For example:

1. The school district may need to address real and urgent social issue in a child's life, such as family abuse or neglect.
2. The student may have an urgent need for food and shelter.
3. The student may have medical or other health issues that need attention.
4. The student may need bus passes if the family has no transportation options readily available.
5. The student may need counseling or other special services.

Child Services is called in severe cases. At times, the chronic absence of a student is the only sign that something is wrong in the student's home, although there are many more underlying problems.

Even with additional funding under the LCFF formula, the economically disadvantaged districts have distinct challenges. The chronically absent rates in these districts are still higher than in the more affluent districts like San Ramon Valley and Orinda Union that receive little to no special LCFF revenues. The data suggest that family and demographic factors play a larger role than simply school funding in contributing to student absentee rates.

All of this underscores the importance of setting the right priorities for funding programs to improve school attendance. The key to any program's success is focus and effectiveness. To help get a student back on track and to "beat the odds" arising from chronic absence from school will depend heavily on tailoring programs that address the particular needs of the student--whether the barrier is family problems, financial barriers, psychological issues or language challenges.

Inconsistencies among School Districts' Attendance Programs

The County's school districts do not have compatible systems to track student attendance nor do they have a common protocol to analyze the attendance of each student. Thus, it is difficult for County education leaders to identify those students who are chronically absent. Without such information, education leaders have difficulty pinpointing students who need assistance.

The problem is not unique to Contra Costa County. There is no standard attendance tracking system for the County or the State. Instead, each district has an independent tracking system for the students in their districts. This attendance information is only shared if requested, at which time it is uploaded or, in some cases, hand entered into another system.

The lack of standard tracking tools has particular impact on foster youth and homeless students since they are more transient and harder to track. School districts such as Mt.

Diablo Unified School District have an administrative team to help foster youth with their school placement and the subsequent adjustment to the new school. However, other districts do not have such a team in place. As districts do not have standard graduation requirements and do not assign the same credit value for classes, it is more challenging to assist foster youth to plan for graduation as these youth often transfer between districts.

If each school district had an effective tracking system to identify the chronic absence problem and strong infrastructure in place, it would help those students most in need. If data from the system were accessible at a central County office, trends and particular problems identified could be shared with other districts as appropriate. Through better data collection, each school should be able to more quickly identify a student struggling with attendance and step in before they are too far off track.

The Special Problem of Elementary School Absences

Studies have shown that a pattern of absences at an early age in school can set a downward path that a student may not be able to make up later. Despite these findings, many parents believe that elementary school absences are not as serious a matter as absences in later school years. The most common parental misconceptions are the following:

1. Regular attendance in grades K-3rd grade is not as important as in later years.
2. Students will catch up in school before they get to high school.
3. Missing consecutive days is more harmful than just a few days here or there.
4. As long as the parent approves of the reason for the absence, it should not be as serious a concern.

These misconceptions may have contributed to less than 50 percent of the County's 3rd grade students achieving a grade-level reading score. The map on the following page shows that only 46 percent of all public school students in the County are reading at grade level by the 3rd grade.

County	Elementary school truancy rate
Alameda	23.8%
Contra Costa	28.6%
Marin	10.7%
Napa	6.2%
San Francisco	22.7%
San Mateo	12.9%
Santa Clara	14.4%
Solano	18.6%
Sonoma	11.9%

Source: California attorney general

An important case study reached the following conclusions about high school student dropout rates in relation to chronic absences in early school years:

- Recognizing poor attendance patterns early and finding a way to solve the problem helps more students graduate.¹
- Students with regular elementary and middle school attendance graduated 95 percent of the time and had less than a 5 percent dropout rate.
- Students with a good attendance rate in the early years of school, but who begin to disengage in 5th and 6th grades became chronically absent in later years and drop out of high school at about a 25 percent rate.
- Students who start out with poor attendance, take two paths:
 - Those who improve their attendance significantly by 8th grade drop-out 10 percent of the time.
 - Those whose attendance become worse by 8th grade drop-out 20 percent of the time.

What Programs and Tools Work to Improve School Attendance?

An effective plan to improve school attendance and reduce the chronically absent rate in the County's schools must include the following:

1. Individual Improvement Plans: Tailor attendance improvement plans for each individual chronically absent student, recognizing that each case is unique.

¹ See Jason Schoeneberger's 2012 study, "Longitudinal Attendance Patterns Developing High School Dropouts" This study shows the importance of building good attendance habits in the early grades and continuing to attend school regularly through middle school. While emphasizing the dangers for the student of the odds of graduating dropping dramatically in cases of chronic absence in the elementary years, it did offer some hope for those who achieve an attendance turnaround by the 8th grade.

Students have different problems depending on their family's financial circumstances; their English language skills; conflicts that may exist in their homes; the parenting skills and encouragement provided by their parents or caregiver; mental or physical challenges; and medical issues.

2. Emphasize Importance of Attendance in Elementary School: As noted, patterns and habits of regular attendance—and their disturbing counterpart, chronic absence—start in elementary school with consequences that can be far-reaching.
3. Make Regular School Attendance a Priority Goal in School and District Budget Plans: Schools and the school districts need to focus attention and resources on improving regular attendance. Higher attendance rates lead directly to higher state education grants that are tied to ADA rates. Districts should recognize that the “return on investment” for spending on programs to improve school attendance reaps rewards financially, as well as in better futures for the students and the community.
4. Improved Absence Tracking Systems: To measure improved attendance results and to help verify which programs work, the districts need accurate and easily accessible data in order to track attendance patterns by school. Each district also needs details on how each school used their LCCF funding to improve attendance.
5. Build Community and Parent Support: The County, cities, and districts should take initiatives to educate and inform the public of the importance of improving school attendance—for better student futures, for better and stronger communities, and for the increased financial support that will flow to their community schools from state funding.

This report explores below in more detail the programs that have worked to improve school attendance.

Individual Improvement Plans - SART and SARB

There are state laws in place that provide some frameworks to meet the special needs of students with school attendance problems or school behavior problems. The key components of this framework are the “School Attendance Review Team (SART) and the “Student Attendance Review Board” (SARB) processes. The SART and SARB process is set forth in the State Education Code sections 48320 through 48325. The law was enacted to enhance the enforcement of compulsory education laws and to divert students with school attendance or behavior problems from the juvenile justice system until all available resources have been exhausted.

Education Code Section 48321 provides several organizational structures for School Attendance Review Boards (SARBs) at the local and county level to create a safety net for students with persistent attendance or behavior problems. Although the goal of SARBs is to keep students in school and provide them with a meaningful educational experience, SARBs do have the power, when necessary, to refer students and their

parents to court, the county probation department, or to a district attorney mediation program.

Elements of the SART and SARB processes have shown promise in reducing chronic absenteeism rates. The SART process is an early intervention process for cases of chronic school absences that takes effect before the SARB process begins. During the SART process the student and his family (parents) meet with school representatives (typically a counselor, the Child Welfare and Attendance representative, the principal and/or vice principal, and anyone else at the school who may be relevant to the case) to discuss the reasons for the chronic absenteeism of the student.

The family and student are then assessed by the SART team to determine the root cause of the attendance issues. The team compiles an individual action plan to make improvements. The plan may include special tutoring, or even basics such as providing a bus pass for transportation to and from school. The SART team typically asks for a contract of commitment to attend school, which is signed by the student and his or her parents.

If a student's attendance does not improve after the SART process has completed, he or she is designated a "habitual truant". The student and his or her parent/guardian may then be required to attend a SARB hearing. The SARB's function is to act as the last step before schools engage with prosecuting authorities to deal with the truancy issue.

At a hearing, SARB committee members identify the core problem and its contributing factors through discussion with the parents of the truant student and the student. The objective is to tailor strategies to improve the student's attendance. By doing so, the SARB members can determine if available community resources – such as County health care services, County welfare services, nutritional counseling or alternative transportation options – can resolve the truancy problem.

If a SARB determines that available community resources can resolve the attendance problem, the SARB will refer the student and parent to the relevant service providers and may require proof of participation in those services.

In practice, the parents also enter into a SARB "contract;" its main goal being to improve student attendance. If a parent fails to respond to the directives of a SARB, either by failing to attend the SARB hearing in the first instance or failing to comply with the SARB contract, the SARB will generally refer the matter for criminal prosecution.

Students and parents in the County who disregard or ignore the SARB process and are still chronically absent are then directed to the County's "new parent" court or, for high school students, teen truancy court.

Truancy court meets twice a month in downtown Martinez. The tools the judge employs to encourage school attendance are limited to the resources available in the County.

These include a delay in obtaining a driver's license, 25 hours of tutoring, sessions with a mental health counselor, drug education and cognitive behavior modification classes on Saturdays (Stay Alive at 25).

Some students still resist and the Court, in extreme cases, may require ankle monitors attached to the high school age student to track them during the school day. The DA's Office has an investigator who then monitors the student's whereabouts during school hours. These tracking methods appear to have had some success as they provide the student a ready excuse to avoid hanging out with the wrong crowd, and instead, attend class.

The elements of the SART, SARB and truancy court processes that have been the most effective in combating truancy are those that focus individually on the problems faced by each student, and then are reinforced by intervention from the school representatives or, in the extreme cases, by a superior court judge through the truancy or new parent court.

West Contra Costa Unified School District (WCCUSD) once had a teen truancy court in Richmond. This court facilitated attendance by parents and students in the district who are struggling with regular attendance. Without having a local teen truancy court, fewer referrals come in to Martinez from WCCUSD. The new parent court in Martinez has a high caseload that could be better managed if there were additional court locations and staff available to facilitate the program.

Engage at Elementary School Level

As noted above, the importance of good attendance habits during the student's elementary school years is often overlooked. Emphasizing individual action plans to address the early stages of truancy at county school districts can be part of the solution. Elementary-aged students are generally relatively willing to cooperate in initiatives to encourage school attendance, provided they have family support. The districts, in turn, can take the steps necessary to focus family attention on the importance of early school attendance and assist families in overcoming any financial or logistical hurdles that may prevent their child from getting to school on a regular basis.

Make Regular School Attendance a District Budget Priority.

As previously emphasized, the missing student is the answer to the missing funds. Solve why the student is absent and find the money to help them stay in school. Increased student attendance means more funding to the district so any modest improvement pays the district back with increased revenue and student achievement.

While 100 percent attendance is virtually impossible according to school administrators, achieving an incremental improvement of one percent can be a difficult (but achievable) task. Even a one percent increase in a school's ADA rate could add substantially to that school's funding. Most school districts that report spending less than \$50,000 on truancy

and chronic absence programs, recouped between \$500,000 and \$1 million dollars in ADA funding because of modest investments in awareness and prevention programs. Accordingly, making improved school attendance a budget priority should pay for itself. It may well, if successful, even result in additional much needed funds for the school district budget—a “win-win” for all concerned.

Despite the very attractive return on investment (or multiplier effect) from investing in programs to improve school attendance rates, most of the school districts have little to no general fund budget for attendance tracking, truancy prevention tools or truancy awareness programs. Districts that qualify through LCFF funding criteria for millions of dollars to help support students in improving their attendance are the rare exceptions.

These funds target specific subgroups and provide critical resources and programs for those students most at risk. However, even those LCFF funded districts do not appear to have systems in place that accurately track chronic absenteeism or that analyze what aspects of their programs are most effective in improving attendance and the annual cost of these programs.

School districts that do not qualify for special LCFF or federal funding to combat chronic absenteeism have to fund and implement their own support programs. The number of students in need in the latter districts is generally less, reflecting the smaller number of economically disadvantaged students. However, these students are at risk of being left behind if the districts do not fund such support programs.

Most truancy programs have factors in common. They identify the family as the primary source of a student’s attendance problem and operate on the assumption that the sole effective solution to getting the student back on track is uncovering and then removing the barriers preventing regular attendance.

Some programs are effective in helping students get back on track and stay there. However, since the COE has few programs and limited funding, it is up to the school districts and the COE to prioritize their spending on the most effective programs.

The truancy court run by the Contra Costa County Superior Court has an effective partnership with the Lincoln Child Center. The Center provides hands-on family counseling services that have been highly effective in reducing chronic absenteeism. They provide everything from help in finding housing to mental health care for the student. However, these types of programs are expensive because of the depth of care and resources needed to assist the families. For some students, Medi-Cal benefits fund half of Lincoln Child Center fees. However, this leaves these vital programs vulnerable with only short term funding and a complete dependence on non-profit contributions to sustain temporarily these vital programs.

There is no long-term plan to guarantee ongoing funding for NGOs like the Lincoln Child Center. Yet funding of these NGOs by school districts would be a very wise investment

if they in fact increase school attendance. Such funding would ultimately pay for itself by lowering rates of chronic absenteeism, and by increasing ADA funding.

These programs provide a valuable service to the students who are most in need, yet they could help even more students if they were expanded. Without these types of programs, the County is likely to lose ADA funding and without assistance, many of these children are not likely to graduate.

Effective Data Collection and Software

All of the school districts in the County use a computer based attendance-tracking system. Each teacher records whether a student is present or absent on a desktop computer screen. The information is uploaded into the master computer in the school front office. If the teacher forgets to collect attendance, the front office notifies the teacher before the end of the day to do so.

Some of the school districts use the “Aries Attendance Tracking” system. Other districts such as WCCUSD use “Power School” and San Ramon Unified School District uses “Infinite Compass”. Each system has its pros and cons, and the cost of the systems varies.

Regardless of the system used, an effective anti-truancy program relies on prompt analysis of attendance data to discern problems and trends. Ideally, the analysis should be performed at the school and individual student level. One such initiative—the “Attendance Works” initiative—offers just such analysis and data tracking.

“Attendance Works” is a nationwide nonprofit initiative that offers assistance, best practices, and attendance tools to help school districts improve attendance in their districts. They work with large governmental agencies such as the US Department of Education, the State Department, and even the White House to get grant funding for improving attendance. They help school districts across the country write grant applications to secure funding for attendance programs, counselor’s tools, materials to prevent absenteeism, and awareness about the importance of school attendance.

With the help of Applied Survey Research, “Attendance Works” uses self-calculating spreadsheets for school districts called the “District Attendance Tracking Tools” (DATTs). The companion tools are the “School Attendance Tracking Tools” (SATTs), which provide school-level analysis down to the individual student level.

DATTs and SATTs are Excel files embedded with formulas, tables, and charts, designed to work with a school’s student information system. School districts can upload attendance data and receive analysis of chronic absence rates by school, grade and racial/ethnic breakdowns, as well as a list of absentee students. While they do not replace a district’s regular data system, the Attendance Works tools are helpful for

providing a snapshot of the levels of chronic absenteeism in the school or district and the ability to view information in real time to address the issues quickly.

The DATT and SATT software is available free of charge from Attendance Works. While Attendance Works requests that users share their summary data for research purposes, it is only shared externally either with permission from the school district or on an anonymous basis.

Only 5 of the County's 18 school districts participate in the Attendance Works Pilot Program started by the COE, which began during the 2015 school year. The school districts that did not participate in this program were either not invited or did not accept an invitation to join.

To share best practices in reducing chronic absences, Attendance Works holds regular meetings with the following five (5) school districts: Martinez, Mt. Diablo, WCCUSD, John Swett, and Pittsburg. The school districts that participate report receiving great benefit from each meeting and say the opportunity to speak with other school districts is welcome and always helpful.

"Sharing best practices and common challenges just makes sense," said a top-level school official. Another administrator related that they never leave a meeting without learning something or sharing something new with the group. The administrators who attend these workshops vary but usually are school leaders and support staff directly involved with the attendance process, student services, or counselors who work directly with students needing support.

The keys to effective data collection as reported by Attendance Works are as follows:

1. Actionable Data- needs to be accurate, accessible, and regularly reported.
2. Capacity Building- expands ability to interpret data and work together to adopt best practices.
3. Shared Accountability- ensures monitoring and incentives to address chronic absence.

Attendance Works has all the features needed to track and trend individual attendance and is widely accepted by those that have used it.

Community Engagement and Awareness

School districts participate in the Attendance Awareness month, facilitated by the COE, each September. However, the COE does little to promote this as a countywide event. It mainly provides handouts and banners to school districts to place up around their schools.

Some elementary schools have been more creative, such as those in the John Swett school district. That district recently had attendance competitions between classrooms. In another awareness raising activity, the County recently had an art contest around the theme of attendance saying "Every School Day Counts". San Ramon Valley Unified School District encourages the parents to notify the school if they take their children on week or longer vacations. The school district can then have the teacher prepare a week or longer lesson for the student while they are gone.

The State pays the school district if the student completes the vacation plan and in turn, the student is not counted as absent. Countywide, more can be done to make an impact with the month long attendance program campaign and to make parents more aware of common misconceptions about attendance and what role they play in the education of their children.

The countywide attendance slogan is "Every Day Counts". This should be a well-known phrase that is drilled into parents and children as they try to ensure that their children have good attendance. Community reinforcement and peer pressure can have positive results on school attendance rates.

Other Program Ideas

1. Daytime Curfews

A daytime curfew is another promising idea for reducing truancy and chronic absenteeism in the County's schools. Cities that have a daytime curfew see a reduction of juvenile daytime crime. In Contra Costa County, police report that 60 percent of juvenile crime occurs between 8 am and 3 pm on weekdays, during school hours. Some of the local cities now have curfews imposed between 8 am and 1 pm. The curfew deters "hangout" sites, decreasing the incentives for the children to leave school. The only cities the Grand Jury was able to confirm having daytime curfew ordinances were eight of Contra Costa's 19 cities including Pittsburg, Richmond, El Cerrito, San Pablo, Hercules, Pinole, Martinez and Concord.

Few school administrators, and fewer students, are aware of whether cities in their district have a daytime curfew. However, many school administrators believe that a daytime curfew would be helpful and a logical policy to have in effect to encourage school attendance.

For cities that do not have a daytime curfew it often has to do with setting legal priorities for officers who spot truant students out during school hours. In some cases, officers report that their priorities are directed elsewhere than to lower priority truancy issues. Where there is no daytime curfew then there is no legal obligation for the police officer to intervene. Imposing a daytime curfew for

students should be seriously considered in view of the positive impact it may have on school attendance rates.

2. County Office of Education (COE) Involvement

The COE meets monthly with district superintendents; however, truancy and attendance is not usually an agenda item for these meetings. Monthly COE meetings could be a useful forum for school superintendents to discuss chronic absenteeism and those programs and initiatives that have been most effective in their districts in addressing this issue.

3. Designated Staff for Improving School Attendance

The information collected by each district, how often it is shared, and to what extent it is discussed within each district varies tremendously. Some districts produce and regularly distribute attendance reports to their schools containing rates of chronic absenteeism, which helps to quickly identify the students most in need of support. However, other districts in the County do not have the tools or infrastructure in place to collect, track and monitor this information on a regular basis.

Many do not have designated staff or comprehensive data collection in place to gather and provide administrators current data. Those districts that have a well-staffed and dedicated team to manage, track and respond to data, are able to better identify those students in need and provide support more quickly. Having dedicated staff in each district focused on improving school attendance is essential to an effective anti-truancy effort and successful plan to reduce chronic absenteeism.

Conclusion

An empty seat in the classroom means a child is not getting the education they deserve and need to succeed in life. The reason a child does not attend school regularly can vary, be complex and require significant support, or be as simple as needing a bus pass. If we never find out what the barrier is then we have failed to help that child receive the education they deserve. And if we do find out, but then lack the infrastructure or ability to help, then we have failed.

The County has caring and competent school administrators who understand the importance of a child being in school. District superintendents and staff understand what is required of them. With the new LCAP, which requires more structure and purpose around taking attendance, many struggle with a lack of a well-developed strategy and infrastructure. Districts with certain (State designated) student populations qualify for LCFF funding and have an opportunity to use those funds to significantly reduce their chronically absent rates.

The COE could provide strong leadership to train, facilitate and assist school districts in working more closely with each other to improve the County's ADA. A higher ADA rate is a "win-win" result that deserves greater resources and attention by the districts and the COE.

With a modest investment, and strong leadership the County can help the school districts improve their overall attendance. Attendance is not just something we should do but rather an indicator of how a child is doing in life. In this fast-paced modern society, there is little time to catch up once you fall behind.

Early focus on elementary school attendance is a cost effective way to improve long-term educational outcomes, and in turn, improve lives. With a concerted effort and a designed plan, student attendance can improve. The County's school districts should make sure they have done all they can to provide its children with the educational skills needed to compete and succeed in today's rapidly changing world.

FINDINGS

- F1. Based on truancy rates, during the 2014 – 2015 school year the County ranked among the worst in the State, 46th out of 58 counties.
- F2. Based on chronic absences during elementary school, during the 2014 – 2015 school year the County ranked last out of the nine Bay Area counties.
- F3. The SART and SARB programs help maintain and improve attendance rates, thereby increasing ADA funding for each school in the district and in the COE.
- F4. Not all County school districts comply with the requirement found in California Education Code section 15497 that each district collect, track and report its chronically absent rates in an annual LCAP.
- F5. The COE does not currently know the chronically absent rates for all of the County's school districts because the COE lacks relevant data needed to perform the analysis.
- F6. To identify students with attendance issues and quickly address these issues, the school district needs complete and accurate data about attendance and a well-developed support infrastructure.
- F7. The school district has its own software system for collecting attendance information and its own process and standards for collecting, storing and utilizing the truancy attendance information gathered, which are not necessarily the same as other districts in the County.
- F8. Without a centralized attendance system or compatible software among school districts, it is challenging to get a complete picture of a student's attendance profile and patterns over multiple years or across districts.
- F9. Some school districts have little communication with other school districts and the COE about best practices, common achievement goals, and best data systems regarding attendance.
- F10. The California Attorney General, Kamala Harris 2015 report, "*In-School and on Track*", indicates that over 80 percent of chronically absent students in kindergarten and 1st grade are unable to read at grade level by 3rd grade. These students are four times more likely to drop out than children who can read at grade level.
- F11. The city does not have a daytime curfew.

- F12. The city that has and enforces a daytime curfew sees less daytime and juvenile crime.
- F13 Chronically absent or truant students, who do not get back on track before age 18, are more likely to drop out of high school before graduation.
- F14 Parent and Truancy Courts offer attendance support and are one of the last opportunities to alter a student's attendance behavior.
- F15 Attendance improvement programs used by the County's Juvenile Courts, such as the Lincoln Child Center, ankle monitors, drug and mental health counselors and tutoring classes lack long-term funding.
- F16 The school districts that have Truancy or Resource Officers who connect directly with students, help get chronically absent or truant students back on track.
- F17 There is currently no teen truancy court in the WCCUSD area.
- F18 The WCCUSD does not provide sufficient staff to process chronically absent students through the Parent or Truancy Court in Martinez.
- F19 The amount and allocation of funds provided by the State and spent by the COE for LCFF oversight activities and instructional programs is not reported in detail by the COE, making it difficult for the public to discern the size of the programs targeting attendance improvement and their impact on attendance rates.

RECOMMENDATIONS

- R1. The COE should consider developing a comprehensive multi-year plan for improving attendance rates that has annual goals.
- R2. The COE should consider assessing each school district's capacity to collect, track and improve attendance, and identifying funds to do so. As part of this assessment, the COE should:
- a. Define the unique make up of each school district's student population.
 - b. Analyze which attendance systems are used in the County.
 - i. How many different ones are there?
 - ii. Are they compatible and able to share data?
 - iii. Do they all provide the critical information needed to track chronically absent rates and attendance patterns in their schools?
 - c. Determine what additional training and support school districts need to meet their goals and improve their attendance.
 - d. Determine which school districts lack effective programs to ensure improvement in attendance.
 - e. Provide an overview of the SART and SARB programs, and delineate the partners with whom they work in the County, and the services provided to the students in need.
- R3. The COE and the BOS should consider providing financial support to the Parent and Truancy Courts in Martinez by providing a multi-year funding plan for critical tools and programs to help struggling families most in need: e.g., funding of Lincoln Child Center, counseling programs, ankle monitors, drug use prevention and treatment, and identifying funds to do so.
- R4. The COE should consider helping WCCUSD reinstate a local parent and truancy court by providing the juvenile courts in Richmond information on the need for these programs and support for best practices and programs.
- R5. The COE should encourage all school districts to participate in the Attendance Works program and to use the free tools provided.
- R6. All school districts should consider participating in the Attendance Works program.
- R7. If a school district declines to participate in Attendance Works, the COE should consider asking for a written explanation as to why the district declined to participate and what programs the district is currently using that would be comparable.
- R8. The COE's office should consider placing attendance as a standing agenda item at its monthly meeting with school district superintendents.

- R9. School districts should raise parent awareness concerning how to prevent a student's school absence from affecting ADA funding or the student's truancy rate.
- R10. COE should consider creating a centralized attendance data system for the County that would include regularly uploaded information from school districts about school absences and ADA data, and identifying funds to do so.
- R11. COE should provide training in advanced tracking techniques with free tracking tools that would be compatible across schools and districts in the County, such as Attendance Works and Aries attendance tracking software, and identifying funds to do so.
- R12. Each school district should consider designating staff to collect, track, and analyze, attendance data in order to follow up on students that appear to be at risk, and identifying funds to do so.
- R13. The COE should help to close the communication gaps among the districts by creating an atmosphere of dedication and communication that encourages districts to freely share highlights and best practices at monthly meetings.
- R14. The school district should consider incentivizing schools to seek increased ADA funding by means such as splitting the additional ADA money between the district and the school for achieving increased ADA funding.
- R15. The COE should consider identifying funds to produce an annual County attendance report that would be publically available countywide, both online and in hardcopy, which includes:
- a. Data on measurable goals. (who achieved, who fell short)
 - b. Highlighted area for both teachers and students, telling their success stories.
 - c. Description of the increased funding from improved ADA countywide and what new programs help to contribute to the result.
 - d. Information about district graduation rates, college enrollment, English learners and economically disadvantaged students.
 - e. Information about programs available and encourage families to seek help before their child falls behind.
- R16. The COE should consider encouraging city councils that do not have a daytime curfew to pass and enforce one.
- R17. The City should consider adopting a policy to promulgate, enforce, and promote a daytime curfew.

REQUIRED RESPONSES

	<u>Findings</u>	<u>Recommendations</u>
County Office of Education	F1 – F10, F12 – F19	R1 – R11, R13, R15 - R16
Acalanes Union High School District	F3-F4, F6 – F10, F13-F16	R6, R9, R12, R14
Antioch Unified School District	F3-F4, F6 – F10, F13-F16	R6, R9, R12, R14
Brentwood Union School District	F3-F4, F6 – F10, F13-F16	R6, R9, R12, R14
Byron Union School District	F3-F4, F6 – F10, F13-F16	R6, R9, R12, R14
Canyon School District	F3-F4, F6 – F10, F13-F16	R6, R9, R12, R14
John Swett Unified School District	F3-F4, F6 – F10, F13-F16	R6, R9, R12, R14
Knightsen Elementary School District	F3-F4, F6 – F10, F13-F16	R6, R9, R12, R14
Lafayette School District	F3-F4, F6 – F10, F13-F16	R6, R9, R12, R14
Liberty Union High School District	F3-F4, F6 – F10, F13-F16	R6, R9, R12, R14

Martinez Unified School District	F3-F4, F6 – F10, F13-F16	R6, R9, R12, R14
Moraga School District	F3-F4, F6 – F10, F13-F16	R6, R9, R12, R14
Mt. Diablo Unified School District	F3-F4, F6 – F10, F13-F16	R6, R9, R12, R14
Oakley Union Elementary School District	F3-F4, F6 – F10, F13-F16	R6, R9, R12, R14
Orinda Union School District	F3-F4, F6 – F10, F13-F16	R6, R9, R12, R14
Pittsburg Unified School District	F3-F4, F6 – F10, F13-F16	R6, R9, R12, R14
San Ramon Valley Unified School District	F3-F4, F6 – F10, F13-F16	R6, R9, R12, R14
Walnut Creek School District	F3-F4, F6 – F10, F13-F16	R6, R9, R12, R14
West Contra Costa Unified School District	F3-F4, F6 – F10, F13-F18	R6, R9, R12, R14
City Council of Antioch	F11-F12	R17
City Council of Brentwood	F11-F12	R17
City Council of Clayton	F11-F12	R17
City Council of Concord	F12	R17

City Council of Danville	F11-F12	R17
City Council of El Cerrito	F12	R17
City Council of Hercules	F12	R17
City Council of Lafayette	F11-F12	R17
City Council of Martinez	F12	R17
City Council of Moraga	F11-F12	R17
City Council of Oakley	F11-F12	R17
City Council of Orinda	F11-F12	R17
City Council of Pinole	F12	R17
City Council of Pleasant Hill	F11-F12	R17
City Council of Pittsburg	F12	R17
City Council of Richmond	F12	R17
City Council of San Pablo	F12	R17
City Council of San Ramon	F11-F12	R17
City Council of Walnut Creek	F11-F12	R17

These responses must be provided in the format and by the date set forth in the cover letter that accompanies this report. An electronic copy of these responses in the form of a Word document should be sent by e-mail to epant@contracosta.courts.ca.gov and a hard (paper) copy should be sent to:

Civil Grand Jury – Foreperson
725 Court Street
P.O. Box 431
Martinez, CA 94553-0091

Glossary of Terms

The following definitions from the “In School + On Track 2015” report are listed below:

Truancy	In California, a student is truant if he/she is absent or tardy by more than 30 minutes without a valid excuse on 3 occasions in a school year.
Habitual Truancy	A student is habitually truant if he/she is absent without a valid excuse for 5 days during a school year.
Chronic Truancy	A student is chronically truant if he/she is absent without a valid excuse for at least 10 percent of the school year.
Chronic Absence	In California, chronic absence is defined as being absent for any reason (excused or unexcused) for at least 10 percent of the school year. Thus, in a 175 or 180-day school year, a student who misses 18 days of school or more is chronically absent.
Excused Absence	Valid excuses may include illnesses, doctor or dentist appointments, personal reasons justified by a parent or guardian and other reasons within the discretion of school administrators.

Appendix

LOCAL CONTROL FUNDING FORMULA:

The enabling legislation was signed into law in 2013 and implemented in 2014. It allocates funding grants based on average daily attendance for students in each school district. The additional resources are allocated to districts based on the following, disadvantaged subgroups-low income, ethnically at risk, English learners, foster youth and homeless youth.

These funds are used to provide critical infrastructure for those students most at risk and replaced the previous K–12 finance system, which had been in existence for roughly 40 years.

For the COE, the LCFF establishes separate funding streams for oversight activities and instructional programs.

As part of the LCFF, school districts, COE's, and charter schools are required to develop, adopt, and annually update a three-year Local Control and Accountability Plan.

LOCAL CONTROL AND ACCOUNTABILITY PLAN:

Original estimates provided by the State Department of Finance in 2013–14 indicated there would be an additional state cost of approximately \$18 billion available for the school districts and take eight years to phase in completely. There would be \$58 million for COEs and it would take two years to phase in completely.

In 2013, the State of California also put in place the LCAP, which requires each school district, charter school and county office of education to:

- Complete an annual report for the State addressing their school district's eight state priorities.
- Address "Pupil Engagement" – A state priority measured by reporting school and high school dropout rates
- Set improvement goals and an action plan to achieve them.

The SARB process

It begins when the school sends out their first letter to the family indicating that child has missed too much school. This is usually three to five unexcused absences. Some school districts have a centralized letter process that verifies this child does not have extenuating circumstances that would make sending a letter insensitive, such as loss of a relative or a severe injury. However a centralized letter process (while more sensitive) also requires additional dedicated staff that have real-time-data-tracking of all students in the system. Some districts only use an automated service, which makes it more difficult to intercept any letter that should not go out. Next, they send out two subsequent letters,

if the child continues to be absent. Then they invite the parent(s) to the SART meeting, which is followed by the SARB panel. Finally, if none of this works, the case is referred to court.

The COE's LCFF funding

The COE instructional programs are funded through an alternative education grant as follows:

- Provides a uniform base grant per ADA for certain pupils served by county offices (on probation, probation referred, and expelled pursuant to EC Section 48915 (a) or (c)).
- Targeted pupils are those classified as English learners (EL), meet income requirements to receive a free or reduced-price meal (FRPM), foster youth, or any combination of these factors (unduplicated count).
- COEs also receive a concentration grant equal to 35 percent of the base grant multiplied by ADA and the unduplicated percentage of targeted students exceeding 50 percent of enrollment.
- Provides a uniform base grant per ADA for juvenile court school pupils. Additionally, all juvenile court school pupils are deemed to be eligible for the supplemental and concentration grants provided for unduplicated pupils.
- Other pupils served by COEs are funded based on the LCFF funding of their home school district.

August 2, 2016

By U.S. Mail and email (epant@contracosta.courts.ca.gov)

Mr. Michael Simmons, Foreperson
Contra Costa Civil Grand Jury
725 Court Street
P.O. Box 431
Martinez, CA 94553-0091

Re: City of Concord Response to Grand Jury Report No. 1615: Truancy and Chronic
Absence in Contra Costa County Schools

Dear Mr. Simmons:

This letter serves as the City of Concord's response to the Contra Costa County Grand Jury's findings and recommendations set forth in Report No. 1615, entitled *Truancy and Chronic Absence in Contra Costa County Schools*. This letter was reviewed by the Concord City Council at its August 2, 2016 meeting, and I was directed to submit the response for the City of Concord.

I. FINDINGS

Finding No. 11: "The city does not have a daytime curfew."

Response to Finding No. 11: The City of Concord disagrees with this finding. The City of Concord Municipal Code contains Chapter 9.40, which establishes a daytime curfew and includes provisions for parent education and violation enforcement.

Finding No. 12: "The city that has and enforces a daytime curfew sees less daytime and juvenile crime."

Response to Finding No. 12: The City of Concord agrees with this finding.

II. RECOMMENDATIONS

Recommendation No. 17: “The city should consider adopting a policy to promulgate, enforce, and promote a daytime curfew.”

Response to Recommendation No. 17: The City of Concord has implemented this recommendation. The City of Concord daytime curfew ordinance was enacted in July 2011. Since then, the ordinance has been the impetus for the issuance of hundreds of warnings and citations to juveniles, and concurrent education of parents. The City intends that the daytime curfew ordinance will continue to be a primary tool in addressing truancy and juvenile crime problems.

Guy Swanger, Chief of Police, is available to answer any questions or provide any additional information concerning the above responses or enclosed documents. You can reach him at (925) 671-3193 or by email at guy.swanger@cityofconcord.org.

Sincerely,

Valerie J. Barone
City Manager