

H B

109



REPLY TO
ATTN OF:

A00/J

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION X
ALASKA OPERATIONS OFFICE
3200 HOSPITAL DRIVE
SUITE 101
JUNEAU, ALASKA 99801

Handwritten: HB 109

February 13, 1987

Handwritten: RECORDED

FEB 20 1987

Mr. Dennis D. Kelso, Commissioner
Department of Environmental Conservation
P.O. Box 0
Juneau, AK 99811-1800

Dear Mr. Kelso:

In response to your request we have completed a cursory review of Senate Bill 98.

Sections 1(b), 2(c) and 3(b) state "The commissioner may not require a higher discharge quality for water used than the quality of water received for the use." This provision is incompatible with the federal Clean Water Act (Act).

The Act establishes, prior to any consideration of water quality, a technological basis for pollution control. This control takes into consideration available treatment technology and economics. Once this level of control is identified and established through the regulation development process it must, at a minimum, be applied regardless of quality of water received at an operation. For example, properly sized settling ponds might be the prescribed treatment technology for certain categories of placer mining operations. Settling ponds have consistently demonstrated the capability to achieve .2 milliliter per liter settleable solids or lower in the effluent regardless of the quality of the water received at the operation. Under this scenario, federal law would limit settleable solids from a placer mining operation to .2 milliliter per liter, regardless of the influent or other water quality factors. Where more stringent control is necessary to meet water quality standards, the additional limits are set in the permit.

Section 3 as amended is confusing, but its focus seems to be limited protection of downstream beneficial use. It is unclear what is intended in the separate treatment of drinking water supply in the second sentence of Section 3. There is not a problem from a federal perspective with state law being "no more restrictive than federal law." However, the Act and implementing regulations require that all beneficial uses (existing or potential) established through state classification be protected in a manner consistent with state water quality standards. Classifications can only be changed through procedures established by federal regulation. Water quality standards are federally approved and likewise can only be modified through federally established procedures.

Table IV

DEC Staff Allocations for NPDES

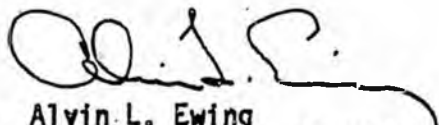
<u>DEC Office</u>	<u>Position</u>	<u>Workyear (FTE)</u>		
		<u>New</u>	<u>Existing</u>	<u>Total</u>
<u>Commissioner's Office</u>				
Public Information Office	Public Information Officer			.1
Data Processing	Analyst Programmer			.4
	Subtotal	.5	-0-	.5
<u>Division of Environmental Quality</u>				
Water Quality Management	Environmental Engineer			1.5
	Project Coordinator			1.0
	Admin. Assistant			.5
	Clerk Typist			.5
	Subtotal	3.0	.5	3.5
SERO (Region I)	Environmental Engineer			.3
	Env. Field Officer			1.0
	Admin. Assistant			.5
	Clerk Typist			.5
	Subtotal	2.0	.3	2.3
SCRO (Region II)	Environmental Engineer			3.0
	Environ. Field Officer			3.0
	Admin. Assistant			.5
	Clerk Typist			1.5
	Subtotal	5.0	3.0	8.0
NRO (Region III)	Environmental Engineer			5.0
	Envir. Field Officer			3.0
	Admin. Assistant			.5
	Clerk Typist			1.0
	Subtotal	4.5	5.0	9.5
Laboratory/Monitoring	Chemist			2.0
	Lab Technician			2.0
	Subtotal	4.0	-0-	4.0
	Total Work Years	19.0	8.8	27.8

Allocation: 20.3 Professional (11.5 new, 8.8 existing)
 4.0 Mid-level (4.0 new)
 3.5 Clerical (3.5 new)

To the extent that Section 3 as amended is consistent with the foregoing discussions, it does not present a problem from a federal perspective. However, if the intent is to limit the commissioner's authority to require protection of all established beneficial uses or to fully implement established state water quality standards it does present a problem. Limitation of the commissioner's authority would restrict the state's ability to continue performance of functions provided for under the Act such as Section 401 water quality certifications for National Pollutant Discharge Elimination System (NPDES) permits. It would also run counter to efforts by the state to assume additional authority under the Act, i.e. delegation of the NPDES permit program. In addition, adoption by the state of any law that conflicts with the Act would inhibit the state's and EPA's flexibility to seek resolution of issues associated with placer mining. The other three sections cited would potentially have the same impact.

I hope this information is useful to you. If there are additional questions, please call me at (907) 271-5083.

Sincerely,



Alvin L. Ewing
Assistant Regional Administrator

**STATE OF ALASKA 1987 LEGISLATIVE SESSION
FISCAL NOTE**

Bill Version: HB 109
Publish Date: _____

REQUEST: _____

Revision Date: _____
Title: An Act relating to the use of water

Agency Affected: Environmental Conservation
BRU: Environmental Quality

Sponsor: Representative Mike Miller, et al
Requestor: HESS

Components: regional offices, laboratory central office

EXPENDITURES/REVENUES: (Thousands of Dollars)

OPERATING	FY 87	FY 88	FY 89	FY 90	FY 91	FY 92
PERSONAL SERVICES		1019.8	1019.8	1019.8	1019.8	1019.8
TRAVEL		116.0	116.0	116.0	116.0	116.0
CONTRACTUAL		361.1	303.6	303.6	303.6	303.6
SUPPLIES		21.8	21.8	21.8	21.8	21.8
EQUIPMENT		352.6	70.0			
LAND & STRUCTURES						
GRANTS, CLAIMS						
MISCELLANEOUS						
TOTAL OPERATING		1871.3	1531.2	1461.2	1461.2	1461.2

CAPITAL		0	0	0	0	0
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REVENUE		0	0	0	0	0
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FUNDING: (Thousands of Dollars)

GENERAL FUND		1871.3	1531.2	1461.2	1461.2	1461.2
FEDERAL FUNDS						
OTHER						
TOTAL		1871.3	1531.2	1461.2	1461.2	1461.2

POSITIONS:

FULL-TIME		22	22	22	22	- 22
PART-TIME						-
TEMPORARY						

ANALYSIS : (Attach a separate page if necessary)

possible risks to sources of Clean Water Act federal funds to DEC's operating budget (\$896,000/year) and to sewer construction money (\$13,800,000/year) are not included

Prepared by: Randy Rayliss
Division: Office of the Commissioner

Phone: 465-2600
Date: April 9, 1987

Approved by Commissioner: [Signature]
Agency: Environmental Conservation

Date: April 14, 1987

Distribution (by preparer):

- Legislative Finance
- Legislative Sponsor
- Requestor
- Office of Management and Budget
- Impacted Agency(ies)
- Senate Secretary

DEC FISCAL NOTE ANALYSES
HB 109 An Act relating to the use of water
page 2 of 11 Comments and Assumptions

At present, the State has not assumed wastewater permitting authorities from the federal Environmental Protection Agency under the federal NPDES permit program. When EPA issues federal permits, DEC reviews them to see whether water quality standards would be met: the so-called "certification" process.

Since HB 109 is incompatible with the federal Clean Water Act*, DEC could not "certify" federal permits, either EPA NPDES permits, Corps of Engineer dredge and fill permits, or Federal Energy Regulatory Commission (FERC) licenses.

Alaska Statutes 46.03.110 provide that if DEC can not certify a federal permit, DEC must issue a separate state permit. If HB 109 became law, DEC would need to develop a permitting structure similar to the federal structure.

Because HB 109 diverges from the federal Clean Water Act, DEC could not rely upon information or guidance from EPA for permit issuance. DEC would have to collect facts and evidence for each permit application.

In accordance with AS 46.03.110, DEC procedures require public notice, 30 day comment period, and participation by the Departments of Fish and Game, Natural Resources, Commerce and Economic Development, and Health and Social Services. DEC rules, 18 AAC 15, provide for an optional public hearing.

To calculate the fiscal impact to DEC from HB 109, we started with the costs of assuming the federal NPDES permit program, which would have the same number of permits and roughly the same procedural requirements.

Costs of assuming the NPDES program have been well studied. Attachments are provided to document these costs.

Fifteen percent has been added to these projected costs in this fiscal note to reflect the increased costs to address the additional requirements imposed under HB 109 to assess "immediate downstream uses."

* Problems with compatibility with the Clean Water Act are described in more detail in our Position Paper. Also see EPA's letter dated February 13, 1987 re SB 98, identical language to HB 109, paragraph 2:

"Sections 1(b), 2(c), and 3(b) state 'The commissioner may not require a higher discharge quality for water used than the quality of water received for use.' This provision is incompatible with the federal Clean Water Act."

STATE OF ALASKA 1987 LEGISLATIVE SESSION
FISCAL NOTE

Bill Version: HB 109
Publish Date: _____

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Agency Affected: Environmental Conservation
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Components: regional offices, laboratory central office

EXPENDITURES/REVENUES: (Thousands of Dollars)

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TRAVEL		116.0	116.0	116.0	116.0	116.0
CONTRACTUAL		361.1	303.6	303.6	303.6	303.6
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EQUIPMENT		352.6	70.0			
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TOTAL OPERATING		1871.3	1531.2	1461.2	1461.2	1461.2

CAPITAL		0	0	0	0	0
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REVENUE		0	0	0	0	0
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FUNDING: (Thousands of Dollars)

GENERAL FUND		1871.3	1531.2	1461.2	1461.2	1461.2
FEDERAL FUNDS						
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TOTAL		1871.3	1531.2	1461.2	1461.2	1461.2

POSITIONS:

FULL-TIME		22	22	22	22	22
PART-TIME						
TEMPORARY						

ANALYSIS : (Attach a separate page if necessary)

possible risks to sources of Clean Water Act federal funds to DEC's operating budget: (\$896,000/year) and to sewer construction money (\$13,800,000/year) are not included

Prepared by: Randy Bayliss

Phone: 465-2600

Division: Office of the Commissioner

Date: April 9, 1987

Approved by Commissioner: [Signature]

Date: April 14, 1987

Agency: Environmental Conservation

Distribution (by preparer):

- Legislative Finance
- Legislative Sponsor
- Requestor
- Office of Management and Budget
- Impacted Agency(ies)
- Senate Secretary

Assuming the federal program would increase the State's flexibility in regulating discharges to Alaska's waters, to a certain extent. Agency actions would still be subject to federal statutes and regulations. EPA would retain an active oversight role.

At the same time, the State must carefully consider all implications of assuming the program. Both financial support and a commitment to addressing complex technical requirements will be needed. In addition, program assumption imposes some constraints upon the State, specifically:

The State's regulatory flexibility will remain limited. To a large extent, permit terms and conditions will be prescribed by federal regulation. EPA's oversight would extend to reviewing and approving major permits, conducting occasional independent inspections of permitted facilities, and taking independent enforcement actions when determined necessary by EPA.

The state must be prepared to enact new state laws, if needed, and regulations to meet federal program requirements, both for initial assumption and on an ongoing basis as federal requirements change.

EPA will retain the right to withhold federal grant funds from the state for non-compliance with program requirements.

Of course, there will be increased costs to the state to assume and maintain the program as reflected in this increment.

No new sources of federal funds have been identified by EPA as available to defray the costs of NPDES program assumption. While program costs are eligible for federal funding under sections 106 and 205(j) of the Clean Water Act, the state is in receipt of all federal funds available under these sections, and those funds are presently fully obligated for ongoing water pollution control activities.

Costs to assume the NPDES program have been estimated by DEC staff. The cost of each program activity required by federal regulation was estimated from EPA pricing factors, cost information supplied by other states, and staff estimates of required level of effort. Existing resources presently devoted to NPDES functions were deducted from the total costs to yield the incremental costs shown in the cost summary that follows. EPA will review the state's proposed budget for program assumption. Program delegation is contingent upon their finding that the state has budgeted sufficient funds to administer the program.

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ADDITIONAL
EXPLANATION
FORM

AGENCY Environmental Conservation

BRU Environmental Quality

COMPONENT Water Quality Management

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Revised Date:

1-9-87

A summary of the required program activities and itemized costs are shown below. While this request shows all funding within the Water Quality Management component, funding would eventually be distributed to other components through the revised program process as shown below.

SUMMARY OF REQUIRED NPDES PROGRAM ACTIVITIES

<u>Activity</u>	<u>Responsible Components</u>
Permitting <ul style="list-style-type: none"> ◦ Issue and reissue permits ◦ Revoke permits ◦ Modify permits ◦ Hold public hearings ◦ Assist permit applicants ◦ Hold adjudicatory hearings (includes contractual funding for hearing officers) 	Southeast Region Southcentral Region Northern Region Water Quality Management
Compliance Monitoring <ul style="list-style-type: none"> ◦ Inspect permitted facilities ◦ Review monthly reports submitted by permittees ◦ Investigate complaints ◦ Locate nonpermitted facilities ◦ Analyze water samples 	Southeast Region Southcentral Region Northern Region Laboratory and Monitoring Section
Enforcement (includes assistance from the Department of Law) <ul style="list-style-type: none"> ◦ Administrative actions ◦ Civil cases ◦ Criminal complaints ◦ Pre-enforcement actions ◦ Analyze water samples 	Southeast Region Southcentral Region Northern Region Laboratory and Monitoring Section

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ADDITIONAL
EXPLANATION
FORM

AGENCY Environmental Conservation

BRU Environmental Quality

COMPONENT Water Quality Management

FY 88

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Revised Date:

1-9-87

Activity

Responsible Components

- Program Management
 - Public information
 - Training
 - State/Federal coordination
 - Maintenance of regulations
 - Technical assistance

- Data and Records Management
 - Develop data management system
 - Develop application and other required forms
 - Routinely enter data
 - Routinely transmit information to EPA
 - Maintain mailing lists

Water Quality Management
Office of the Commissioner

Southeast Region
Southcentral Region
Northern Region
Water Quality Management
Office of the Commissioner

<u>Component</u>	FTEs	100	200	300	400	500	TOTAL
Water Quality Management	3.0	143.1	15.5	220.0	3.0	10.5	392.1
Southeast Region	2.0	89.1	7.9	10.0	2.0	10.0	119.0
Southcentral Region	5.0	227.1	30.0	25.0	5.0	21.5	308.6
Northern Region	4.5	212.1	36.0	22.5	4.5	11.3	286.4
Laboratory and Monitoring	4.0	188.4	8.0	34.0	4.0	253.0	487.4
Office of the Commissioner	0.5	27.0	3.5	2.5	0.5	0.3	33.8
Total	19.0	886.8	100.9	314.0	19.0	306.6	1627.3*

*Includes \$296.0 in one-time equipment and contractual funds. Continuing total costs are \$1331.3.

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ADDITIONAL
EXPLANATION
FORM

AGENCY Environmental Conservation

BRU Environmental Quality

COMPONENT Water Quality Management

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Revised Date:

1-9-87

SUMMARY OF COSTS BY LINE ITEM

100 Line Items

The \$886.8 in personal services will fund 19 new permanent full-time positions. Those positions are comprised of 11.5 professional positions, 4.0 subprofessional administrative and technician positions, and 3.5 clerical/typist positions. The 19 positions are in addition to the existing 9 positions currently performing NPDES-related functions.

200 Line Items

The \$100.9 in travel will provide funding for the new professional positions, and supplement current travel funding for existing professional positions to perform inspections, respond to complaints and emergencies, and otherwise carry out field activities.

300 Line Items

The \$314.0 in contractual funds includes a one-time cost of \$50.0 in the Water Quality Management Component to develop the data management system required as part of the program. Also included are funds in all components for routine contractual services (rent, copying, telephones, etc.): \$34.0 is included in the Laboratory and Monitoring component for maintenance contracts for laboratory equipment. In the Water Quality Management component \$30.0 is included for discharge impact evaluation studies, \$80.0 for legal assistance from the Department of Law, \$40.0 for hearing officers for adjudicatory hearings, and \$5.0 for printing of forms and manuals.

400 Line Items

The \$19.0 in this line is to provide routine supplies (paper, pencils, etc.) for the new positions.

CS	ADDITIONAL EXPLANATION FORM
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AGENCY Environmental Conservation
BRU Environmental Quality
COMPONENT Water Quality Management

FY 88

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Revised Date:

1-9-87

500 Line Items

The \$253.0 in equipment funding includes a one-time cost of \$46.0 for filing, word processing and computer equipment; and a one-time cost of \$200.0 for a spectrophotometer to allow the laboratory to analyze water for toxic constituents as required under the NPDES program. The remaining funding will be needed on a continuing basis for vehicles, and minor laboratory and office equipment.



ADDITIONAL
EXPLANATION
FORM

AGENCY Environmental Conservation
BRU Environmental Quality
COMPONENT Water Quality Management

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Revised Date:

1-9-87



STATE OF ALASKA
OFFICE OF THE GOVERNOR
BILL ANALYSIS

DEPARTMENT Fish and Game	DIVISION Habitat Division	BILL NUMBER HB 109	SPONSOR Miller et al.
DEPARTMENT POSITION Support State's opposition to Section 1(b)			
PREPARED BY Habitat Division	DATE 4/7/87	COMMISSIONER'S SIGNATURE <i>Don Williams</i>	DATE 4/11/87

SUMMARY

OTHER AGENCIES AFFECTED BY BILL Department of Natural Resources Department of Environmental Conservation	CONSTITUENT GROUP(S) AFFECTED BY BILL Sportsmen, Recreational Users, Subsistence Users, Commercial Fishermen, Tourism Industry
ORGANIZATIONAL SUPPORT FOR BILL Placer Mining Industry	ORGANIZATIONAL OPPOSITION TO BILL Native Groups, Environmental Groups, Commercial Fishing Groups

FISCAL IMPACT: NONE FISCAL NOTE ATTACHED

BACKGROUND/LEGISLATIVE INTENT

HB 109 would prohibit the departments of fish and game, environmental conservation, and natural resources from requiring a higher discharge quality for water used than the quality of water received for use. HB 109 would also restrict imposition of wastewater effluent criteria for turbidity which are more restrictive than federal standards. Finally, HB 109 will streamline the water use permitting process by establishing a base, presumptive threshold for small scale water appropriations below which notice and permit notification under AS 46.15 are waived.

ANALYSIS OF BILL/PROGRAM EFFECTS

Section 1(b) implies that ADF&G implements water quality standards, and because department does not, the provision should be deleted.

AMENDMENTS PROPOSED

Deletion of Section 1(b).

PLEASE ATTACH A SEPARATE SHEET FOR ADDITIONAL COMMENTS OR ANALYSIS.

STATE OF ALASKA 1987 LEGISLATIVE SESSION
FISCAL NOTE

REQUEST: _____

Bill Version: _____
Publish Date: 4/7/87

Revision Date: An Act Relating to the Use
Title: of Water

Agency Affected: Fish and Game
BRU: _____

Sponsor: Miller et al
Requestor: _____

Components: _____

EXPENDITURES/REVENUES: (Thousands of Dollars)

OPERATING	FY 87	FY 88	FY 89	FY 90	FY 91	FY 92
PERSONAL SERVICES		0				
TRAVEL		0				
CONTRACTUAL		0				
SUPPLIES		0				
EQUIPMENT		0				
LAND & STRUCTURES		0				
GRANTS, CLAIMS		0				
MISCELLANEOUS		0				
TOTAL OPERATING		0				

CAPITAL		0				
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REVENUE		0				
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FUNDING: (Thousands of Dollars)

GENERAL FUND		0				
FEDERAL FUNDS						
OTHER						
TOTAL		0				

POSITIONS:

FULL-TIME		0				
PART-TIME		0				
TEMPORARY		0				

ANALYSIS : (Attach a separate page if necessary)

Prepared by: Bruce Baker Phone: 465-4105
Division: Habitat Date: 4/9/87

Approved by Commissioner: [Signature] Date: 4-11-87
Agency: Fish and Game

- Distribution (by preparer):
- Legislative Finance
 - Legislative Sponsor
 - Requestor
 - Office of Management and Budget
 - Impacted Agency(ies)
 - Senate Secretary



ANCHORAGE WATERWAYS COUNCIL

801 W. Fireweed Lane, Suite 103 • Anchorage, Alaska 99503 • 277-9287

March 10, 1987

Committee on Health, Education
and Social Services
Pouch V
Juneau, Alaska 99811

Attn: Representative Niilo Koponen
Committee Chairman

Re: House Bill No. 109

Dear Representative Koponen:

The Anchorage Waterways Council (AWC) has reviewed HB109 and has concluded that the bill should not be passed or should be substantially revised. Our conclusions are based on the potential for adverse water quality effects, and the subsequent threat to the health and welfare of downstream users, if HB109 is passed as it is now written. Our specific comments are provided below by issue, with reference to relevant section numbers in the bill.

DISCHARGE QUALITY BETTER THAN QUALITY RECEIVED
(Ref: Sections 1, 2, and 3 of HB109)

While the AWC concurs that it should not be the responsibility of the user to clean up waters which do not meet water quality standards due to natural causes or upstream users, we would like to point out potential problems with this issue as it is written:

- 1) The quality of the water received by the user should be measured upstream of all influence by the user and should not in any way have been affected by the user upstream of the point of measurement. This concern relates to the potential for the user to develop areas of the basin that could degrade the water quality upstream of the location of intake by the user.
- 2) All pertinent water quality parameters should be considered in the evaluation. While turbidity may not increase during use, other water quality parameters may do so. These other parameters may include, but are not limited to: inorganic chemical contaminants such as arsenic, iron, lead, mercury, and silver; organic chemical contaminants such as endrin, lindane, and toxaphene; physical contaminants such as temperature, total suspended solids, and total dissolved

solids; and total coliform bacteria contaminants. These parameters, and others that may be added to the waters during use, are likely to be a larger health threat than turbidity and should be checked.

REGULATION ON THE USE OF WATER
(Ref: Section 3 of HB109)

Setting water quality regulations on the basis of "immediate downstream use" is not appropriate since water quality constituents can be transported large distances downstream. Following the argument that the user should not be required to clean up the water more than what would be in the stream naturally, downstream users should not be required to clean up water discharged by an upstream user that has greater concentrations of pollutants than what is naturally found in the stream. Water quality regulations need to be based on all of the downstream users that could be affected.

SMALL SCALE USE OF WATER
(Ref: Section 4 of HB109)

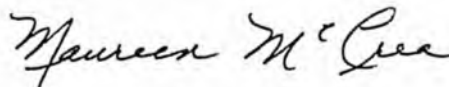
The use of small quantities of water without obtaining a permit has two weaknesses:

- 1) Monitoring of the quantity of water used could not be accomplished unless some notification of the intent to withdraw the water is given.
- 2) The lack of a formal application eliminates the ability to identify what other water rights have been granted for that reach of stream.

While the definitions of "significant amount of water" are precise, a quantification of the maximum amount of withdrawal should also be expressed as a percentage of the existing stream flow so that the stream is not dewatered during low flows.

The AWC has lessor concerns regarding the remainder of HB109. We think that this bill should not be passed as it is currently written since it requires substantial revisions to maintain adequate health and welfare protection for downstream users. We would like to review the bill again if you choose to retain and revise it. Please feel free to call either Larry Rundquist (wk: 562-2514 hm: 279-7395) or me (wk: 261-4664 hm: 345-2453) if you have any questions.

Sincerely,



Maureen McCrea
President

STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

OFFICE OF THE COMMISSIONER

STEVE COWPER, GOVERNOR

400 WILLOUGHBY AVE.
JUNEAU, ALASKA 99801-1796
PHONE: (907) 465-2400

April 8, 1987

file

The Honorable Niilo Koponen
The Honorable Johnr/ Ellis
Co-Chairmen, House Health, Education,
and Social Services Committee
Alaska State Legislature
P.O. Box V
Juneau, AK 99811

Dear Representatives Koponen and Ellis:

Subject: HB 109, an act relating to use of water.

Position: The Department of Natural Resources supports the provisions of the bill that exempts small scale uses of water from permit and notice requirements.

Background: Section 4 combined with Section 7 amends AS 46.15 to allow the use of less than 5,000 gallons of water in a single day or the recurring use of 500 gallons per day from a single source without a permit or certificate to appropriate, except when adverse impacts to existing water rights or the public interest are identified.

Sections 5 and 6 amend AS 46.15.133 to exempt applications to appropriate 1,000 gallons per day or less from the current notice requirements, subject to certain exceptions with respect to the number of users, the request of a municipality, or if the source of water is from a stream designated as anadromous.

Recommendation: The Department of Natural Resources supports the changes described above. CSSB 98 currently would grant the same notice exemption, but sets the level at 5,000 gallons per day and the department supports that degree of change as well. In the experience of the department, the appropriation of such amounts of water has not caused significant problems. There are provisions in the proposed amendments which require public notice if the amount of water available is limited with respect to the number of users, or upon request of municipalities.



Lisa

**STATE OF ALASKA
OFFICE OF THE GOVERNOR
BILL ANALYSIS**

DEPARTMENT Health and Social Services	DIVISION Public Health	BILL NUMBER HB 109	SPONSOR Representative Mike Miller
DEPARTMENT POSITION The Department of Health and Social Services has no position on this bill. It does not affect any areas of the Department's or Division's responsibility.			
PREPARED BY Randall P. Burns, Special Assistant	DATE 02/20/87	COMMISSIONER'S SIGNATURE <i>[Signature]</i>	DATE 02/20/87

SUMMARY

OTHER AGENCIES AFFECTED BY BILL	CONSTITUENT GROUP(S) AFFECTED BY BILL
ORGANIZATIONAL SUPPORT FOR BILL	ORGANIZATIONAL OPPOSITION TO BILL

FISCAL IMPACT: NONE FISCAL NOTE ATTACHED

BACKGROUND/LEGISLATIVE INTENT

ANALYSIS OF BILL/PROGRAM EFFECTS

AMENDMENTS PROPOSED

PLEASE ATTACH A SEPARATE SHEET FOR ADDITIONAL COMMENTS OR ANALYSIS.

