



BUSINESS ACTION ITEM STAFF REPORT

ITEM 8A. HEARING TO CONSIDER PROTESTS TO PROPOSED SERVICE CHARGE INCREASES, AND IF NO MAJORITY PROTEST EXISTS IN ACCORDANCE WITH ARTICLE XIID OF THE CALIFORNIA CONSTITUTION AND THE PROPOSITION 218 OMNIBUS IMPLEMENTATION ACT (COMMENCING WITH SECTION 53750 OF THE CALIFORNIA GOVERNMENT CODE), ADOPT THE ATTACHED ORDINANCE WHICH AMENDS THE WATER AND WASTEWATER SERVICE RATES

Recommendations:

It is recommended that the Board:

1. Conduct a public hearing to consider protests to the proposed Ordinance, which amends water and wastewater service rates, and upon conclusion of the hearing, determine whether there is a majority protest;
2. If there is not a majority protest in accordance with Article XIID of the California Constitution and the Proposition 218 Omnibus Implementation Act (commencing with Section 53750 of the California Government Code), adopt the attached Ordinance, which amends the service rates; and
3. If adopted, waive the reading of the Ordinance.

Summary:

The San Simeon Community Services District (“District”) provides water and wastewater services to District residents and businesses. The fees paid by the District’s customers have not increased since 2022 and are insufficient to cover the cost of the services.

The District adopted Ordinance No. 121 in 2019 to authorize an increase in water, and wastewater service rates for five years beginning with the 2019-2020 fiscal year. The Ordinance authorized a 5.8% increase for the 2019-2020 fiscal year and CPI (Consumer Price Index) + 3% increases each year for the following four fiscal years. Although the District was authorized to implement a CPI + 3% increase for the 2023-2024 fiscal year, the District only implemented the authorized increases through the 2022-2023 fiscal year. The District has not implemented a rate increase since 2022 despite rising costs and the District’s inability to cover the cost of services under the

current rates.

In 2022, the District received support from the California Rural Water Association to draft new five-year studies for water and wastewater rates. During the process, the District decided not to move forward to finalize and implement those studies. Preliminary drafts calculated initial residential rate increases of 16-52% for water, and 22% for sewer. The wastewater study also included additional sewer increases of 12% the second year, 10% in the third and fourth year and 6.5% the fifth year. The water study also included rate increases of 4% for CPI in successive years.

The FY25-26 Adopted Budget approved by your Board included an assumed 36% rate increase based on structural deficits identified in the Preliminary Budget.

The Rate Analysis (Attachment 3) identifies an increase of 32% for water and provides analysis for increases ranging from 36% to 88% for wastewater. An increase of 88% is the amount required for full recovery of operating costs in the wastewater fund. The proposed increase is directly related to increased operating expenses, and the proposed increase raises rates to cover increased operating costs as well as necessary capital investment for the water system. The District has compared the proposed rates with the cost of providing water and wastewater services, and the District has determined that the proposed rate increase would not exceed the cost of providing water and wastewater services to District customers.

Discussion:

Proposition 218 established substantive and procedural requirements for a public agency increasing property-related fees and charges. A “fee” under Proposition 218 means “any levy other than an ad valorem tax, a special tax, or an assessment, imposed by an agency upon a parcel or upon a person as an incident of property ownership, including a user fee or charge for a property related service.”¹ Proposition 218’s requirements apply to fees charged by a local government to provide water and sewer services.

Property-related fees must comply with the following substantive provisions of Proposition 218:

1. Revenues derived from the fee must not exceed the funds required to provide the property-related service;
2. Revenues derived from the fee must not be used for any purpose other than that for which the fee is imposed;
3. The amount of a fee imposed upon any parcel or person as an incident of property ownership must not exceed the proportional cost of the service attributable to the parcel;
4. The fee may not be imposed for a service unless the service is actually used by,

¹ Cal. Const., art. 13D, § 2.

or immediately available to, the owner of the property subject to the fee;

5. No fee or charge may be imposed for general governmental services, such as police, fire, ambulance, or libraries, where the service is available to the public in substantially the same manner as it is to property owners.

The District introduced the attached Ordinance on the Board's agenda November 13, 2025. Notices were mailed to all customers of record not less than 45 days prior to today's hearing. Customers were informed of the hearing date, rate increase information, and instructions for protesting the proposed increase.

Protests must be submitted in writing and received by the Clerk of the Board before the close of today's hearing. Only one valid written protest will be counted per parcel. If valid written protests are filed by a majority (50%+1) of the parcels receiving services, then the Board may not adopt the Ordinance.

Attachments:

1. Ordinance
2. San Simeon CSD Proposition 218 Rate Analysis
3. Correspondence received

ORDINANCE NO. _____

AN ORDINANCE OF THE BOARD OF DIRECTORS OF THE SAN SIMEON
COMMUNITY SERVICES DISTRICT INCREASING WATER AND WASTEWATER
SERVICE RATES

The Board of Directors of the San Simeon Community Services District does ordain as follows:

SECTION 1: Pursuant to Government Code Section 25215.5, and in accordance with Article XIII D of the California Constitution and the Proposition 218 Omnibus Implementation Act (commencing with Section 53750 of the California Government Code), there are hereby established within the San Simeon Community Services District ("SSCSD"), rates specified in Exhibit "A" hereto, which Exhibit "A" is incorporated herein by this reference, for the purpose of providing water and wastewater service.

SECTION 2: Effective Date and Publication. This ordinance shall take effect and be in full force and effect thirty (30) days after its passage and before the expiration of fifteen (15) days after passage of this ordinance, it shall be published once with the names of the members of the Board of Directors voting for and against the ordinance in a newspaper of general circulation published in the County of San Luis Obispo, State of California.

SECTION 3. Inconsistent Provisions. To the extent that the provisions of this Ordinance may be inconsistent or in conflict with the terms and conditions of any prior SSCSD ordinance, resolution, rule or regulation governing the same subject, the provisions of this Ordinance shall prevail with respect to the subject matter thereof, and such inconsistent or conflicting terms or conditions of prior ordinances, resolutions, rules or regulations are hereby repealed.

SECTION 4: Severability. If any section, subsection, clause, phrase, or portion of this ordinance is for any reason held to be invalid or unconstitutional by the decision of a court of competent jurisdiction, such decision shall not affect the validity or constitutionality of the remaining portion of this ordinance. The Board of Directors hereby declares that it would have passed this ordinance and each section, subsection, clause, phrase, or portion thereof irrespective of the fact that any one or more sections, subsections, sentences, clauses, phrases, or portions be declared invalid or unconstitutional.

SECTION 5: CEQA Findings: The Board of Directors of the SSCSD finds that the rates and charges adopted by this Ordinance are exempt from the California Environmental Quality Act pursuant to Public Resources Code § 21080(b)(8) and CEQA Guidelines Section 15273. The SSCSD Interim General Manager is directed to prepare and file appropriate notices.

This Ordinance was introduced at a meeting of the Board of Directors meeting held on November 13, 2025. This Ordinance was passed and adopted at a regular meeting of the Board of Directors of the San Simeon Community Services District on January 7, 2026;

Upon motion by

_____ and seconded by _____ by the following roll call vote:

Chairperson Tiwana:
Director Le:
Director Donahue:

Chairperson

ATTEST:

By: _____
Suzanne Watkins
Division Manager
SLO County Public Works Department

APPROVED AS TO FORM:

By: _____
District Legal Counsel, Nubia I. Goldstein

EXHIBIT "A"

Water Service Fee	Rates
Per Month – Per Meter	\$53.62
Water Rates	
*Per 100cf Water Used	
Potable	\$20.17
Irrigation	\$33.83
Wastewater Rates	
*Per 100 cf Water Used	
Motels	\$23.78
Residences	\$21.09
Restaurants	\$31.83
Commercial	\$13.63
State Parks	\$33.30
*100cf = 748 gallons = 1unit of water (accounts are billed in units)	

San Simeon Community Services District

Proposition 218 Rate Analysis

Prepared by County of San Luis Obispo Public Works, under the CalWARN
Mutual Assistance Agreement

November 2025

San Simeon Community Services District Proposition 218 Rate Analysis

Background

San Simeon Community Services District (District) serves a small unincorporated community situated within San Luis Obispo County on California's central coast which is located along State Highway 1 approximately halfway between Los Angeles and San Francisco. Originally called San Simeon Acres, the community wastewater system has been developed over many decades based on the originally purchased infrastructure. San Simeon's development occurred primarily in the 1960s and continued in the 1970s. A moratorium on the issuance of new connections within the District's boundaries has been in place since the mid-1990s. SSCSD serves mostly residential customers, with a small commercial sector, mostly made up of hotels and restaurants. The District also provides wastewater service for Hearst Castle and other neighboring parks. The sewer system consists of approximately 1.6 miles of gravity fed pipelines and a treatment plant, which will need to be relocated in upcoming years.

Reason for Proposed Rates and Charges

The San Simeon Community Services District ("District") provides water and wastewater services to District residents and businesses.

The District water and wastewater systems are aging and require significant maintenance and capital investment to protect public health and safety, to reliably convey and treat water and wastewater, and to ensure regulatory compliance. Costs that must be recovered through rates include, but are not limited to, electricity, chemicals, equipment and supplies, operations and management. Revenues generated from water, wastewater and service rates are also used to finance the maintenance, repair and renovation of existing water and wastewater infrastructure and capital improvement projects. The fees paid by the District's customers have not increased since 2022 and are insufficient to cover the cost of the services.

The current rate structure was adopted following a study in 2019. That study established service charge increases over five years with reference to both projected operating expenses and the consumer price index (CPI) each year. Those modest increases were not adequate to keep up with the operations, maintenance and capital costs to provide water and wastewater services safely and efficiently. In addition, the District did not implement the fifth year (Fiscal Year 23-24) of previously established increases which were authorized for CPI plus 3%.

In 2022, the District received support from the California Rural Water Association to draft new five-year studies for water and wastewater rates. During the process, the District decided not to move forward to finalize and implement those studies. Preliminary drafts calculated first-year

average rate increases between 16% to 52% for water, and 22% for sewer, followed by additional increases for both water and wastewater rates over the following four years. Neither the water nor wastewater study was finalized or implemented.

The District did not receive the benefit of revenue from the adopted 2023 increase nor draft 2022 recommended increases, and income has been stagnant since 2022 while operating costs have continued to increase. As a result, revenue has been insufficient to meet the cost of operations and needed capital investment, and cash levels have declined.

The FY25-26 Adopted Budget approved by the Board included an assumed 36% rate increase based on structural deficits identified in the Preliminary Budget. The water fund does not have revenue available to fund needed capital repairs and improvements while wastewater fund revenues for the current year are projected to fall 88% below the amount needed to fund services without a rate increase.

The proposed increase in water rates is necessary to fund near-term capital investment including meter replacements and Phase I of the water project. The proposed increase in wastewater rates is necessary due to insufficient operating revenues generated by current rates. This analysis did not consider long-term wastewater capital investment requirements due to the significant existing operating shortfall.

Discussion

Proposition 218 established substantive and procedural requirements for a public agency increasing property-related fees and charges. A “fee” under Proposition 218 means “any levy other than an ad valorem tax, a special tax, or an assessment, imposed by an agency upon a parcel or upon a person as an incident of property ownership, including a user fee or charge for a property related service.”¹ Proposition 218’s requirements apply to fees charged by a local government to provide water services, and voter approval is not required for increased water and sewer service fees.²

Property-related fees must comply with the following substantive provisions of Proposition 218:

1. Revenues derived from the fee must not exceed the funds required to provide the property-related service;
2. Revenues derived from the fee must not be used for any purpose other than that for which the fee is imposed;
3. The amount of a fee imposed upon any parcel or person as an incident of property ownership must not exceed the proportional cost of the service attributable to the parcel;

¹ Cal. Const., art. 13D, § 2.

² Cal. Const., art. 13D, § 6(c).

4. The fee may not be imposed for a service unless the service is actually used by, or immediately available to, the owner of the property subject to the fee;
5. No fee or charge may be imposed for general governmental services, such as police, fire, ambulance, or libraries, where the service is available to the public in substantially the same manner as it is to property owners.

To begin the Proposition 218 process, the District must first provide notice of the proposed increase to the affected customers by mail. The notice must state the amount of the fee to be imposed; the basis upon which the fees were calculated; a statement regarding the reason for the increase; and the date, time and location of the public hearing where the Board will consider the increase. The notice must be sent, in this case, to the customers of record.

Recent legislation signed by the Governor gave local agencies an option to implement new rate-setting procedures. Assembly Bill (AB) 2257 became effective January 1, 2025, providing optional procedures for the local agency to prepare written responses to any written objections submitted by a property owner subject to the proposed rates. For agencies following these optional procedures, any litigated challenge to the revised rates will be limited. This process provides additional structure to the objection process and limits the District exposure to potentially costly litigation, which enhances financial stability for ratepayers as a whole.

Analysis and Recommendation

The revenue requirements are based on the projected Costs of Service identified in the Adopted FY25-26 Budget, less the existing Sources of Revenue for each fund. This analysis resulted in an 88% deficiency in funding for wastewater and a 32% deficiency for the water fund. Given the significant operating deficit in wastewater, the rate analysis was completed at the lower level of 36%, or a target revenue requirement of \$715,360. This lesser amount provides sufficient funds to continue operations in the near term, but does not fully fund the system at this time and does not include additional funding for future capital needs.

Billing data is from the base year of calendar 2024, which is the most recent full year of operations.

Table 1 - Summary of Revenue Requirements

Description	Wastewater Fund	Water Fund
Sources of Revenue		
Rate Revenue with Current Rate	\$526,000	\$539,500
Interest Earnings ¹	\$32,500	\$15,000
Non Rate Revenue		
Total Sources of Revenue	\$558,500	\$554,500

Costs of Service		
Fund Expenses	866,583	449,875
Other Expenses ²	155,443	92,202
		<hr/>
Subtotal	1,022,026	542,077
Capital Replacements ³		185,000
		<hr/>
Net Revenue Requirement	1,022,026	727,077
Surplus/(Deficiency)	(463,526)	(172,577)
Projected Rate Increase	88%	32%

1 - Interest Earnings - CLASS account interest

2 - Non-Operating Expenses

3 - Funding for Meter replacements (\$35,000), Phase I of Water Project (\$150,000)

Water Rates

Water rates were calculated by proportioning the revenue requirement between fixed and variable costs. These amounts were then allocated on a per-unit basis by the number of connections (meters) and the number of volumetric billing units (hcf). The proposed rate is based on an 20/80 split between fixed and variable rate recovery. This is similar to the historic allocation for the District.

A review of the Water Fund reveals that the proportion of fixed costs exceeds 30%. Additional calculations were completed to identify the rates resulting from a 25/75 split and 30/70 split between fixed and variable rate. Moving towards a model that recovers fixed costs in the meter rate would improve financial predictability for the District.

Table 2 – Fixed and Variable Water Revenue Requirements

Net Revenue Requirement	727,077	
		<hr/>
Component	Adjusted Net Revenue Requirement	
Variable Costs (Volumetric Share)	581,661	80.0%
Capacity-Related Costs (Fixed Share)	145,415	20.0%
		<hr/>
Net Revenue Requirements	727,077	100%

Table 3 – Adjusted Water Rate Revenue Requirements by Unit

	Variable Cost	Fixed Cost
All Users (meter rate)		53.62
Drinking water	20.17	
Irrigation	33.88	

Table 4 – Current and Proposed Water Rates

Rate Class	Unit	Current Rate	Proposed Rate	Increase	25/75 Split	30/70 Split
All Users	Per meter	42.49	53.62	26%	67.02	80.43
Drinking water	Per hcf	15.19	20.17	33%	18.91	17.65
Irrigation	Per hcf	25.43	33.88	33%	31.76	29.65

The 2022 Draft Rate Study proposed restructuring rates by meter size and offered several options for the calculation. That study is not directly comparable to current or proposed rates by class. A calculation is provided below for reference based on an average residential user (5/8" connection) at the lowest 2022 option for cost recovery.

FY25-26 Residential Rate 2022 Study vs. 2025 Study at 3.15 HCF

	2022 Study	2025 Study Proposed Rate
Meter	74.02	53.62
HCF charge	44.43	63.54
Total	118.45	117.16

Wastewater Rates

The wastewater rate calculation involves a series of steps designed to take customer demand on the system into account. The purpose is to arrive at rates that are proportional to the effect on system costs for each customer class. In general terms, customer rates are affected by three factors: volume generated, treatment costs, and system administration costs.

1. The total wastewater revenue requirement was allocated to operating and maintenance expense functions by the percentage required to support each function. The resulting revenue requirement by function was then allocated among treatment factors that

affect costs, specifically flow volume, Biological Oxygen Demand (BOD), Total Suspended Solids (TSS), and sewer service costs. (Table 5)

The sewer service factor includes costs of maintaining basic services for each customer, while BOD and TSS are measures of effluent strength. Stronger effluent drives additional treatment cost.

The model uses industry standards to allocate the revenue within each function across four factors (volume, BOD, TSS and service costs) proportional to the factor's effect on the expense. For example, Sewer Treatment costs are primarily driven by BOD (45%) and TSS (50%) and only minimally (5%) driven by volume. Half of the Sewer Treatment cost is assigned to TSS.

The total at the bottom of the table gives the revenue requirement attributable to each of the four factors

2. These factors were then weighted by customer class. (Table 6) Volume is distributed by the actual volume generated per class. BOD and TSS are weighted with reference to ranges provided in the State Water Resources Control Board Revenue Program Guidelines and by volume processed. Expenses related to customer accounts and administrative functions were allocated on a per-connection basis as Service costs.

The weights identify the relative impact different customer types have on service costs. BOD and TSS weights consider both treatment costs and volume treated. For example, restaurants typically produce wastewater with higher BOD and TSS than either hotels or residences but their low system usage results in BOD and TSS weights similar to residential users. Residential is the second highest class by volume, and has more meters than any other class, resulting in higher Volume and Sewer Service costs than Restaurants.

3. The resulting ratios from Table 6 are applied to distribute revenue requirements by factor across each customer class. The total revenue requirement for each class is divided by the class volume to reach a class rate per service unit. (Table 7)

Target Revenue Requirement: \$715,360

Table 5 – Wastewater Cost Allocation

Cost Allocation		Total by Function	Volume	BOD	TSS	Sewer Service
Sewer Collection	32.30%	231,061	92,424	69,319	69,319	
Pumping	11.90%	85,128	37,583	23,773	23,773	
Sewer Treatment	15.60%	111,596	5,580	50,219	55,798	
Customer Accounts	7.30%	52,221				52,221
Administrative & General	32.90%	235,353	66,469	70,298	73,038	25,549
Total		715,360	202,056	213,607	221,928	77,770

Table 6 – Weighted Wastewater Allocation

	Revenue Requirement	Motels	Residential	Restaurants	Commercial	State Park
Volume	202,056	68.49%	20.71%	4.07%	2.39%	4.35%
BOD	213,607	77%	7%	8%	1%	8%
TSS	221,928	79%	8%	6%	1%	6%
Sewer Service	77,770	17%	73%	3%	2%	5%
Total	715,361					

Table 7 – Current and Proposed Wastewater Rates

Rates calculated at Total Net Revenue Requirement (88% increase) and proposed in 2022 Draft Wastewater Rate Study have been included in this table for reference

Customer Class	Current	Proposed	Proposed Increase by Class	Rate at 88% Full Cost Increase	FY25-26 Rates per 2022 Study
Motels	18.54	23.78	28%	33.98	24.62
Residential	11.41	21.09	85%	30.13	22.13
Restaurants	28.72	31.83	11%	45.48	32.24
Commercial	11.41	13.63	19%	19.47	13.70
State Park	28.72	33.30	16%	47.57	28.49

The following table reflects the current and proposed average monthly charges

Impact on Average Monthly Bill

	Motel	Residential	Restaurant	Commercial	Irrigation	State Park
Monthly Units	45.29	3.15	17.03	12.00	3.75	109.28
Current Rate						
Meter	42.49	42.49	42.49	42.49	42.49	
Water	15.19	15.19	15.19	15.19	25.43	
Wastewater	18.54	11.41	28.72	11.41		28.72
Monthly Bill	1,569.98	126.37	790.39	361.69	137.76	3,138.57

Proposed Rate - 32% Water, 36% Wastewater

	Motels	Residential	Restaurants	Commercial	Irrigation	State Park
Meter	53.62	53.62	53.62	53.62	53.62	53.62
Water	20.17	20.17	20.17	20.17	33.88	
Wastewater	23.78	21.09	31.83	13.63		33.30
Monthly Bill	2,044.06	183.72	939.34	459.18	180.56	3,692.57
Increase	30%	45%	19%	27%	31%	18%

Option B: Water 25/75 Fixed/Variable Split:

	Motels	Residential	Restaurants	Commercial	Irrigation	State Park
Meter	67.02	67.02	67.02	67.02	67.02	67.02
Water	18.91	18.91	18.91	18.91	31.76	
Wastewater	23.78	21.09	31.83	13.63		33.30
Monthly Bill	2,000.39	193.15	931.28	457.46	186.03	3,705.97
Increase	27%	53%	18%	26%	35%	18%

Option C: Water 30/70 Fixed/Variable Split:

	Motels	Residential	Restaurants	Commercial	Irrigation	State Park
Meter	80.43	80.43	80.43	80.43	80.43	80.43
Water	17.65	17.65	17.65	17.65	29.65	
Wastewater	23.78	21.09	31.83	13.63		33.30
Monthly Bill	1,956.71	202.58	923.21	455.74	191.50	3,719.38
Increase	25%	60%	17%	26%	39%	19%

Option D: Wastewater 88% Full Cost:

	Motels	Residential	Restaurants	Commercial	Irrigation	State Park
Meter	53.62	53.62	53.62	53.62	53.62	53.62
Water	20.17	20.17	20.17	20.17	33.88	
Wastewater	33.98	30.13	45.48	19.47		47.57
Monthly Bill	2,505.81	212.23	1,171.78	529.29	180.56	5,252.54
Increase	60%	68%	48%	46%	31%	67%

Wendy Ball
9136 Balboa Ave
San Simeon, Ca. 93452
ballwcm@yahoo.com
11/24/2025

RECEIVED
DEC 01 2025

Sanitary Sewer and Community
Services District (SSCSD)

To Whom It May Concern,

I am writing to ask the SSCSD to reconsider any proposed rate increases. For over two years, I have been unable to take a shower - not because of plumbing issues, but because I simply cannot afford the cost of water service. As a result, I have been forced to bathe in my sink to conserve what little water I can afford to use.

This has been extremely difficult and has had a serious impact on my daily life. A rate increase at this time would make an already unmanageable situation even worse. I am worried that any additional cost could push me into complete loss of service and further compromise my health and basic hygiene.

I respectfully ask that you take my circumstances into consideration as you review the proposed rate changes. I also request information on any available low-income assistance programs, hardship plans, or billing options that may help customers like me maintain access to essential services.

Thank you for your time and understanding. I appreciate your consideration and look forward to any guidance or support you may be able to offer.

Sincerely,

Wendy Ball



21 September 2015

STATEMENT OF FORMAL PROTEST TO THE ESTABLISHMENT OF INCREASE TO WATER AND WASTEWATER RATES FOR SAN SIMEON COMMUNITY SERVICES DISTRICT.

William A. Gibson & Erin H. Gibson
Owners Jointly of
9152 Balboa Ave., San Simeon, FA 93452
APN #013411001

RECEIVED
NOV 24 2025

As property owners within the San Simeon Community Services District we strongly object to and formally protest the proposed increases to the existing water rates.

From our research, this District has historically had ample opportunities to address rate increases but evidently lacked either the political will or the business acumen to do so. This lack is the direct cause of this outrageous rate increase. And thereby dumping this decision and action on the County, which we feel does not have a real grasp on the population dynamics of San Simeon. Balboa Ave (and San Simeon) is predominantly vacation homes, as such this rate increase will not affect them as much as permanent owners.

From your notice which was dated 14 November 2025 stated the deficit of 32% for water service and 88% wastewater funding deficit (Given the significant operating deficit in wastewater, the rate analysis was completed at the lower level of 36%). Owners who do not live here do not use as much water, so your water deficit which is a result of the Board's lack of business management is now on the backs of individuals who live here permanently.

The Board is advocating a revised meter fee of \$53.62 which, I am assuming are non volumetric, while San Luis Obispo rate is \$31.91 as of 01 July 2025 these base fees cover the cost of maintaining and operating the water system, i.e. pipes and treatment plants, meter reading and general administrative and personnel costs for a 0.75-inch meter.

While I do understand that the water/wastewater system have been ignored for way too long by lack of oversight or seemingly interest by the Board something has to be done before everything collapses, it would be advisable for the Board to at the very least, be transparent in these actions. Indicate what are the actual and projected costs the increase is based upon that will be more in line with adjacent communities. And resubmit the thoughtful findings to the property owners.



WM. A. GIBSON.



ERIN H. GIBSON