



WESTMINSTER

Staff Report

TO: The Mayor and Members of the City Council

DATE: April 13, 2011

SUBJECT: Study Session Agenda for April 18, 2011

PREPARED BY: J. Brent McFall, City Manager

Please Note: Study Sessions and Post City Council meetings are open to the public, and individuals are welcome to attend and observe. However, these meetings are not intended to be interactive with the audience, as this time is set aside for City Council to receive information, make inquiries, and provide Staff with policy direction.

Looking ahead to next Monday night's Study Session, the following schedule has been prepared:

A light dinner will be served in the Council Family Room 6:00 P.M.

CITY COUNCIL REPORTS

1. Report from Mayor (5 minutes)
2. Reports from City Councillors (10 minutes)

PRESENTATIONS

1. City of Westminster Document Management Retention Policy
2. Resource Management Program for City Parks

6:30 P.M.

EXECUTIVE SESSION

1. Review and discuss City facility security measures pursuant to WMC 1-11-3(C)(6) and CRS 24-6-402(4)(d)

INFORMATION ONLY ITEMS

None at this time

Additional items may come up between now and Monday night. City Council will be apprised of any changes to the Study Session meeting schedule.

Respectfully submitted,

J. Brent McFall
City Manager





WESTMINSTER

Staff Report

City Council Study Session Meeting
April 18, 2011



SUBJECT: City of Westminster Document Management and Retention Policy

PREPARED BY: Tami Cannon, Legal Administrator
Linda Yeager, City Clerk

Recommended City Council Action:

Review the proposed Policy and the Resolution adopting a City of Westminster Document Management & Retention Policy, including retention schedules, and provide comments and direction to City Staff.

Summary Statement

- In addition to retention schedules, the Policy includes direction on official record office locations, permanent records, non-records, confidential records, litigation holds, certification for scanning or destruction of records, electronic media, and a glossary.
- The proposed Policy was developed with input from each City department, utilizing terminology and acronyms unique to the City of Westminster.
- The Colorado State Archivist and Attorney General approved the City's proposed retention schedules on February 24, 2011.
- The adoption of this Policy is expected to help protect and preserve the City's history, adhere to statutory requirements regarding the retention and disposition of records uniformly, and assist with timely and efficient responses to open records requests.
- Staff will attend the Study Session meeting to make a brief presentation explaining the proposed policy and will be available to answer questions.

Expenditure Required: \$0

Source of Funds: N/A



Policy Issue

Should the City adopt its own Document Management and Retention Policy, including retention schedules?

Alternative

Do not adopt a City-specific Document Management and Retention Policy, including retention schedules, and continue to operate under the Colorado Model Municipal Records Retention Schedule. This is not recommended as the City of Westminster Document Management and Retention Policy, including retention schedules, provides greater clarity and direction to employees on the City's document management and retention expectations and requirements.

Background Information

The City has been operating under the Colorado Model Municipal Records Retention Schedule since 2002. The Model Schedule is quite lengthy and, as its name implies, generic in nature. Retention periods apply to the information contained within the record, regardless of the physical format of the record (paper, microfilm, computer disk or tape, optical disk, imaged records, email, voicemail, etc.) The City's use of the Laserfiche document storage and retrieval system to electronically scan documents and the constraints of storage space for inactive files create an even greater need for a City-wide, consistent policy for document management and retention. Furthermore, in 2007, the Federal Rules of Civil Procedures were amended to include an obligation to preserve electronically stored information and apply reasonable and good faith efforts to retain information that may be relevant to pending or threatened litigation. Failure to do so can subject the City to sanctions imposed by the Court. Per City Charter, the City Clerk is the official custodian of all public records. Staffing resources in the Clerk's Office do not include a records manager and workload precludes the sole internal responsibility for this function. Additionally, Staff found that the current City-wide records management practices are inadequate. Each department maintains separate filing systems, and duplication of records is common. Gathering information to respond to a request for records can be costly and ineffective.

Therefore, in 2007, a Task Force was formed to select a consultant and a Users' Committee was created consisting of representatives from each department to develop an inventory of documents, oversee implementation, ensure quality control, consistency and compliance, and serve as the point of contact for future document retention and management. City Council authorized the retention of Graham Information Management Associates to provide professional document management consulting services to assist with developing a City-wide document management policy and standards.

In 2008, the consultant provided a proposed policy for the City, based on the Colorado Model. After reviewing the proposed policy, the Task Force determined that improvements could be made, including collapsing several categories and streamlining the policy to make it more user-friendly and comprehensible. Throughout 2009 and 2010, City Clerk Linda Yeager and Legal Administrator Tami Cannon again met with members of the Users' Committee and proposed reorganizing the schedules into two main sections: an "all" department category and separate sections for each department. By doing so, each employee need only refer to two categories of documents for compliance, rather than sorting through hundreds of pages listing the entire City-wide inventory. Retention periods were also collapsed and made as consistent as possible throughout the organization, "permanent" records were accounted for, and records with no "official record office" were assigned.

In order to address and manage the ever-growing volume of emails sent and received by City employees, the Information Technology Department purchased and implemented a program through Postini that retains all incoming and outgoing email automatically for a period of three years. This system will significantly reduce the amount of time and effort employees would otherwise spend in manually managing and purging personal archive folders. Additionally, the system will provide employees with direct access to search, read, reply and forward messages contained in their archive folder.

The Department Head group was briefed on the proposed Policy and supports its adoption. The State Archivist and Attorney General reviewed the City's proposed document retention schedules and granted their approval in February 2011. If Council supports the adoption of the proposed Policy, the Resolution will be scheduled for an upcoming City Council meeting. Following Council adoption, the Policy will be made available to employees electronically on the City's intranet and future trainings will be scheduled.

A copy of the proposed Policy is attached for City Council's review. Staff did not include the retention schedules or official record office codes as these are very lengthy. If any Council members wish to obtain a copy please contact Lynn Voorhees and a copy will be provided.

A Document Management and Retention Policy supports City Council's goal and objective of a "Financially Sustainable City Government Providing Exceptional Services" by providing efficient, cost-effective internal services.

Respectfully submitted,

J. Brent McFall
City Manager

Attachment: Resolution adopting City of Westminster Document Management Policy

RESOLUTION

RESOLUTION NO. _____

INTRODUCED BY COUNCILLORS

SERIES OF 2011

**A RESOLUTION ADOPTING A CITY OF WESTMINSTER
DOCUMENT MANAGEMENT & RETENTION POLICY**

WHEREAS, the City of Westminster has been operating under the Colorado Model Municipal Records Retention Schedule since 2002; and

WHEREAS, a City-wide document management policy was developed that is geared exclusively toward City-specific records; and

WHEREAS, the proposed policy is intended to secure compliance with business and legal requirements on behalf of the City and its employees by establishing procedures and a document retention schedule to effectively and efficiently manage, maintain, and dispose of documents in an orderly, reasonable, efficient and lawful manner; and

WHEREAS, in addition to retention schedules, the policy includes direction on official record office locations, permanent records, non-records, confidential records, litigation holds, certification for scanning or destruction of records, electronic media, and a glossary; and

WHEREAS, the Colorado State Archivist and Attorney General approved the City's proposed retention schedules on February 24, 2011; and

WHEREAS, the adoption of this policy is expected to help protect and preserve the City's history, adhere to statutory requirements regarding the retention and disposition of records uniformly, and assist with timely and efficient responses to open record requests.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF WESTMINSTER that the City of Westminster hereby adopts the attached City of Westminster Document Management & Retention Policy 2010 and supplements incorporated therein and authorizes the City Clerk, as the custodian of records, to pursue and implement future amendments to such Policy as she deems necessary.

PASSED AND ADOPTED this _____ day of May, 2011.

Mayor

ATTEST:

APPROVED AS TO LEGAL FORM:

City Clerk

City Attorney

**CITY OF WESTMINSTER
DOCUMENT MANAGEMENT & RETENTION**

2010



CITY OF WESTMINSTER DOCUMENT MANAGEMENT AND RETENTION

TABLE OF CONTENTS

- A. POLICY
- B. OFFICIAL RECORD OFFICE CODES *(not included here)*
- C. DOCUMENT RETENTION SCHEDULES *(not included here)*
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- F. PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION
AND CONFIDENTIAL RECORDS
- G. LITIGATION HOLD
- H. CERTIFICATION FOR SCANNING OR DESTRUCTION
- I. ELECTRONIC MEDIA
- J. DOCUMENT MANAGEMENT USERS COMMITTEE
- K. ATTACHMENT TO ORIGINAL CONSTRUCTION CONTRACTS
ON FILE IN CITY CLERK'S OFFICE
- L. GLOSSARY

DOCUMENT MANAGEMENT AND RETENTION POLICY 2010

1 PURPOSE

This Policy is intended to secure compliance with business and legal requirements on behalf of the City and its employees by establishing procedures and a document retention schedule to effectively and efficiently manage, maintain, and dispose of documents in an orderly, reasonable, efficient, and lawful manner.

2 SCOPE

This Policy applies to all City:

- Employees;
- Contractors, consultants, vendors, and other workers utilizing City records, as applicable;
- Locations;
- Records, in any format or media; and
- Records in the possession of vendors and third-parties.

3 POLICY

3.1 General

The City's records are valuable assets. Maintenance of records is critical to the accomplishment of our activities. It is imperative, therefore, that all City records be effectively and efficiently managed.

All City business records, irrespective of format or media (e.g., paper, electronic, e-mail message, videotape, microfilm, etc.) must be generated, maintained, and disposed of according to all applicable laws, City Policies, and the City's evolving needs.

For the purposes of this Policy and all document management procedures, the ISO (International Organization of Standardization) 15489 definition of "records" applies. The use of "records" or "documents" throughout shall have the same meaning.

Records: Information created, received, and maintained as evidence and information by an organization or person in pursuance of legal obligations or in the transaction of business. Records fall under this definition, regardless of media.

Records also contain information that is recognized as having operational, legal, fiscal, vital or historical value.

Some examples of records are:

- Building and demolition permits;
- City charter and/or incorporation records;
- Contracts;
- Business e-mails;
- City Council meeting minutes and resolutions;
- Employee personnel files;
- Timesheets;
- Vehicle records; and
- Vendor invoices and bills.

Non-records: Administrative materials that: 1) have no public record retention value; 2) have no operational, legal, fiscal, or historical value; and 3) may be disposed of as soon as they have served their purpose at the discretion of the custodian. See Non-Records section of this Policy.

3.2 Determination and Identification of Records

It is the responsibility of each employee to determine if the information they use, whether internally or externally generated or received, meets the definition of a record and to follow the corresponding retention requirements. Employees should use the City's Document Retention Schedule to make these determinations or contact the City Clerk if the record is not identified in the retention schedule. If no retention period is provided within the schedule, pursuant to C.R.S. section 6-17-104, a 3-year retention shall apply.

3.3 Document Retention Schedule

The Document Retention Schedule establishes retention periods and disposition requirements for the City's records. No record may be destroyed unless it is eligible for destruction pursuant to this Policy, meets all the retention requirements set forth in the Document Retention Schedule, and is not subject to a litigation hold. See Document Retention Schedule section of this Policy.

3.4 Protection of Records

The City's records cover a multitude of subjects and include multiple types of formats. These records are assets that must be protected from unauthorized access, disclosure, or destruction and from physical acts due to fire, floods, or other natural or man-made disasters. The extent of protection requirements for records is also governed by the type of information contained in the record, such as personal privacy, City confidential, or highly sensitive information including

privileged and confidential communications. See Protection of Personally Identifiable Information and Confidential Records section of this Policy.

3.4.1 Physical Protection

All employees are required to maintain records in their possession in a manner that protects them from unauthorized release, disclosure, or destruction.

Protection methods may include, but are not limited to:

- Use of locking cabinets or rooms;
- Use of fireproof or water resistant equipment; and
- Sign-in and sign-out procedures for people and information.

3.4.2 Electronic Protection

Records that are maintained electronically are required to be protected against inadvertent destruction or unauthorized disclosure based on the types of information being stored. Depending on the type of information stored, additional protection methods including password protection and other methods may be required.

4 LITIGATION HOLD PROCESS

Destruction shall be suspended for any records or non-records information, in any format or media, determined to be potentially relevant to any actual or anticipated legal action brought by or against the City. This determination will be made by the City Attorney. Affected employees and departments will be notified as directed by the City Attorney when a litigation hold is put into effect and when a litigation hold release is issued. See Litigation Hold section of this Policy.

5 RESPONSIBILITIES

5.1 City of Westminster

The City is responsible for ensuring that its employees, agents, and contractors, if applicable, are provided with the knowledge and means to comply with this Policy and other document management related policies and procedures.

5.2 City Attorney

The City Attorney is responsible for identifying and managing all litigation holds and litigation hold releases for the City.

5.3 City Clerk / Records Management Officer

The City Clerk, or his/her designee, is responsible for:

- Issuing and maintaining this Document Management and Retention Policy and Schedules therein, including requests for changes, additions, or exceptions as needed due to changes in legal or operational requirements;
- Ensuring City employees are educated with respect to this Policy;
- Monitoring compliance of this Policy through periodic compliance audits;
- Ensuring that records, if applicable, are made available for inspection as required by the Colorado Open Records Act and other federal and state laws and regulations;
- Determining the location where, and media format for, retaining City records based on the Document Retention Schedule;
- Ensuring a procedure is in place for the safe and proper disposal of City records, if applicable, upon the expiration of the applicable document retention period; and
- Designating personnel within each department, division or location who are responsible for capturing, producing, maintaining, and certifying the disposal of records under this Policy.

5.4 Managers and Supervisors

All managers and supervisors are responsible for assuring compliance of this Policy by their staff.

5.5 Employees

Employees are responsible for:

- Ensuring that all business records are generated, retained, and disposed of according to the applicable City document management related policies, retention schedule and procedures;
- Utilizing the definitions set forth in this Policy to assess whether the information being created or received constitutes a “record” and thus requires treatment in accordance with all relevant document management policies and procedures;
- Utilizing the Document Retention Schedule to determine the retention period and requirements for the records they manage;
- Ensuring that any records or non-record information suspended from destruction due to a litigation hold is held in the manner set forth by the City Attorney; and
- Ensuring completion of any and all training required for this Policy.

6 TRAINING

Training will be provided to all employees on the requirements of this Policy and their responsibilities.

7 SUPPLEMENTS TO POLICY

The following sections are incorporated herein by reference:

- Document Retention Schedules
- Official Records Office Codes
- Permanent Records
- Non-Records
- Protection of Personally Identifiable Information and Confidential Records
- Litigation Hold
- Certification for Scanning or Destruction
- Electronic Media
- Document Management Users Committee
- Attachments to Original Construction Contracts on File in City Clerk's Office
- Glossary

PERMANENT RECORDS

The following documents should be retained permanently in their original form and are **not** eligible for destruction. They may be imaged for reference purposes, but do not replace the original record with scanned copies nor destroy the original:

- 1) Records prior to 1900;
- 2) Original minutes of meetings defining administrative decisions, including Boards and Commissions;
- 3) Water rights records (not just Court documents); and
- 4) Deeds to City property

NON-RECORDS

The following types of administrative materials have no public record retention value and may be disposed of as soon as they have served their purpose at the discretion of the custodian.

1. **Catalogs, trade journals and other printed materials** received from other offices, commercial firms or private institutions, which require no action and are not needed for documentary purposes.
2. **Informational or extra copies** of correspondence, completed forms, bulletins, newsletters, etc., prepared for reference and information distribution.
3. **Letters of transmittal** that do not add any information to the transmitted materials.
4. **Miscellaneous memoranda or notices** that do not relate to the functional responsibility of the municipality, such as notices of community affairs, employee meetings, holidays, etc.
5. **Preliminary drafts** of letters, memoranda, reports, worksheets, and informal notes that do not represent significant basic steps in the preparation of record documents.
6. **Routing slips, sheets, or post-it notes** used to direct the distribution of documents.
7. **Outdated or superseded stocks of publications** kept for supply and hand-out purposes.
8. **Telephone messages** that convey nonpolicy informational messages.
9. **Library or museum material** acquired for reference or exhibition purposes.
10. **Identical duplicate copies** of records.
11. **Notes, tapes or recordings that have been transcribed.**
12. **Temporary or transitory material** with little or no bearing on decision-making.

PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION AND CONFIDENTIAL RECORDS

I PURPOSE

This procedure provides requirements and methods for the City and its employees to effectively and efficiently manage, maintain and dispose of records containing personally identifiable information (PII) and confidential records in an orderly, reasonable, and lawful manner to ensure the City's compliance with business and legal requirements.

2 SCOPE

This procedure applies to all City:

- Employees;
- Contractors, consultants, vendors, and other workers utilizing City records, as applicable;
- Locations;
- Records, in any format or media; and
- Records in the possession of vendors and third-parties.

3 PROCEDURE

3.1 General

The City uses and retains many types of information. Some of this information requires special handling due to the content of the information.

3.2 Personally Identifiable Information (PII)

The City is governed by specific rules for the handling and safeguarding of all PII which it collects, stores and uses about its citizens, the public, its employees and contractors.

PII generally refers to any information that can be used to identify or contact an individual or used to identify an existing, previous or prospective employee.

Examples include:

- Full name;
- Social security numbers;
- Bank account information;

- Medical information or history;
- Medical or drug test results;
- Background screen reports;
- Credit card numbers;
- Home address;
- Personal e-mail addresses;
- Personal phone numbers;
- Similar or related information; and
- Any combination or master lists of the above information.

Although the City is required to obtain PII for many of its functions such as payments, employment, and other reasons, PII should only be retained for as long as there is a legitimate business reason to keep the information.

This information must be protected and safeguarded while in the custody of the City and, if it is to be destroyed based on the approved Retention Schedule, must be done so securely and with a certificate evidencing destruction.

Please see the Retention Schedule to ensure that records are destroyed when they are eligible.

3.3 Confidential Records

Confidential records generally contain information that relate to activities of the City that are non-public or otherwise exempt from release under the Colorado Open Records Act or exempt due to attorney-client privilege.

- This information must be protected and safeguarded to prevent its release to outside sources.
- If this information is to be destroyed based on the approved Retention Schedule, such destruction must be done so securely and with a certificate evidencing destruction.
- You should contact the City Attorney's Office if you have any questions about the records you maintain and whether they fall under this category.

3.4 Protection of Personally Identifiable Information (PII) and Confidential Records

While in the custody of the City, records containing PII or confidential records must be safeguarded.

Safeguards for maintaining hard copy records include:

- Storing in locked cabinets or rooms with safeguards against entrance by unauthorized individuals;
- Removing from open spaces while away from the records; i.e., placing in a drawer when you leave your desk; and

- Removing or not adding PII to folder covers or tabs, unless absolutely necessary to locate the file.

Safeguards for electronically stored PII include:

- Only encrypted removable storage devices, including USB jump drives provided by the Information Technology Department are authorized to store or copy PII;
- Use of passwords to protect records from unauthorized use or access, including specific areas of the file servers, systems, applications, etc. that store PII.

3.5 Destruction of Personally Identifiable Information (PII) and Confidential Records

Provided that destruction of records containing PII or confidential records is otherwise proper under the approved Retention Schedule and the records are not part of a records destruction hold, the records must be shredded, pulverized or otherwise safely and completely destroyed so that the records or information is unreadable and/or undecipherable.

Records on electronic media should be made completely undecipherable by use of any type of forensic method.

Certificates of destruction shall be retained by the responsible department.

3.6 Certificates of Destruction

Certificates documenting the destruction of records should be generated and retained by the responsible department for all records that are destroyed internally and that require such certificates.

If an outside vendor is employed to perform the destruction of records, the responsible department should obtain a copy of the Certificate of Destruction from the vendor and retain the same.

Certificates of Destruction should include the following information:

- Date of destruction;
- Description of records being destroyed;
- Destruction method utilized; and
- Signature of responsible person documenting the destruction.

4 RESPONSIBILITIES

4.1 City of Westminster

The City is responsible to ensure that its employees, agents and contractors, if applicable, are provided with the knowledge and means to comply with these procedures.

4.2 City Clerk

The City Clerk, or his/her designee, is responsible for:

- Maintaining these procedures in accordance with legal or operational requirements; and
- Ensuring City employees are educated with respect to these procedures.

4.3 Managers and Supervisors

All managers and supervisors are responsible for assuring compliance of these procedures by their staff.

4.4 Employees

Employees are responsible for ensuring that all records containing PII or confidential records in their control are safeguarded and destroyed according to these and any other requirements applying to these types of records.

LITIGATION HOLD

1 PURPOSE

This procedure provides requirements and methods for the City and its employees to effectively and efficiently manage records and non-record information that may be affected by "litigation holds."

2 SCOPE

This procedure applies to all City:

- Employees;
- Contractors, consultants, vendors, and other workers utilizing City records, as applicable;
- Locations;
- Records and non-record information, in any format or media; and
- Records and non-records information in the possession or vendors and third-parties.

3 PROCEDURE

The City acknowledges that from time to time it may have an obligation to protect its records and non-record information from destruction or alteration due to actual or anticipated legal action brought by or against the City.

Since there are legal considerations for non-compliance with these requirements, it is imperative that the City effectively and efficiently manage these records during a litigation hold.

3.1 LITIGATION HOLD PROCESS

Destruction will be suspended for any records or non-record information, in any format or media, determined to be potentially relevant to any actual or anticipated legal action brought by or against the City. This determination will be made by the City Attorney.

The City Attorney must be informed of the occurrences of any incident, or the receipt of a complaint, demand letter, Notice of Intent to Sue, notice of investigation, or other similar notice, that may reasonably be expected to give rise to legal action, as soon as the situation arises or such document is received.

The City Attorney may issue a litigation hold ordering affected employees to halt the destruction of all potentially relevant records and non-record information, in any format or media including voice mail and e-mail, and to actively preserve such documents.

Alteration, concealment or destruction of documents subject to a litigation hold is prohibited.

Any litigation hold will be communicated to all affected employees by written memorandum distributed via e-mail by the City Attorney. A sample litigation hold memorandum is attached. Employees will be required to acknowledge receipt and understanding of the litigation hold and that the litigation hold is being carried out and they are in compliance with all requirements of the litigation hold.

The City Attorney will notify the Information Technology Department of any litigation hold that will or may require the removal of backup computer tapes from standard rotation, standard deletion or removal of information from systems or any other type of activity that may result in the deletion or removal of any information that may be associated with a litigation hold.

3.2 LITIGATION HOLD RELEASE PROCESS

The City Attorney will notify employees and the Information Technology Department when the litigation hold has been removed.

Documents whose destruction was suspended due to the litigation hold will be put back into normal retention once the litigation hold has been removed. This return to retention may result in the immediate destruction of the records and information.

All destruction of records that are released from a litigation hold must follow approved disposition guidelines. See the Retention Schedule to determine whether or not the records are eligible for destruction.

Attachments

Attachment - Sample - Litigation Hold Notification

LITIGATION HOLD MEMORANDUM

**PRIVILEGED & CONFIDENTIAL
ATTORNEY-CLIENT COMMUNICATION AND
ATTORNEY WORK PRODUCT**

TO:

FROM:

DATE:

RE:

1. If this Memorandum is addressed to you, then you must retain all of the types of documents described below. In other words, do not discard or delete any such documents. An attorney or paralegal will in the future contact you in order to discuss gathering these retained documents (or copies of them) from you.

2. The word "documents" as used in this Memorandum shall be given the broadest definition possible. The word "documents" includes (among other things) paper documents, email, and other electronic documents such as Word, WordPerfect, Excel and PDF documents. The word "documents" includes all drafts. The word "documents" also includes documents you create after you receive this Memorandum.

3. If you know of any employee or other representative of [Government Entity] who may have the types of documents discussed below, but who is not already listed as an addressee of this Memorandum, then please contact [Government Attorney].

4. This Memorandum is a confidential communication from counsel. Do not provide this Memorandum to anyone except other employees of [Government Entity].

5. This Memorandum relates to the following dispute. Please keep in mind that the purpose of this Memorandum is to instruct you and other representatives of [Government Entity] to retain documents relevant to the following dispute:

[Brief Description of the Dispute]

6. If you have any questions about this Memorandum, please contact [Government Attorney].

7. YOU MUST RETAIN THE FOLLOWING DOCUMENTS:

Category No. 1: All documents relating to

Category No. 2: All documents relating to

Category No. 3: All documents relating to

Category No. 4: All documents relating to

CERTIFICATION FOR SCANNING OR DESTRUCTION*

(To be completed and maintained by each Division or Department)

The undersigned hereby certify that [CHOOSE ONE]:

- _____ [range of files numbered _____ through _____]
- _____ [files contained in Box No. _____]
- _____ [files labeled _____]
- _____ [electronic records] **[COMPLETE (B) ONLY]**

the contents of which are listed on the attached sheet have been reviewed and:

(A) Electronically scanned into Laserfiche for retention pursuant to that schedule and labeled for date of destruction eligibility, if applicable. Furthermore, the documents electronically scanned into Laserfiche were reviewed and certified by a minimum of two (2) individuals to be true and accurate copies of the originals, and are legible, reproduceable and migrateable.

_____ Date _____
Contents Reviewed

_____ Date: _____
Scanned

_____ Date: _____
Scanned Contents Confirmed

OR

(B) Disposed of consistent with the retention schedules set forth in the City's Document Management and Retention Policy

_____ Date: _____
Contents Reviewed

_____ Date: _____
Contents Disposed of Pursuant to Retention Schedule

=====
***NOTE:** The following documents should be retained permanently in their original form and are *not* eligible for destruction. They may be imaged for reference purposes, but do not replace the original record with scanned copies nor destroy the original:

- 1) Records prior to 1900;
- 2) Original minutes of meetings defining administrative decisions, including Boards and Commissions;
- 3) Water rights records (not just Court documents); and
- 4) Deeds to City property

ELECTRONIC MEDIA

The City provides a system for automated three-year archiving of all email. This system significantly reduces the amount of time and effort employees would otherwise spend in manually managing and purging personal archive folders. Additionally, the system provides employees with direct access to search, read, reply and forward messages contained in their archive folder.

Email archiving services are provided by Postini. Employees have direct access to their archived email through their Postini login or directly from Outlook. Any email received prior to March 5, 2010, is not stored in the archived items.

QUESTIONS:

Can I still save messages in my Outlook account?

You may continue to use folders and save messages in Outlook, but those items will also be contained within your archive items, so you may find it unnecessary.

Are there some email messages that need to be retained longer than three years?

Depending on the content of the message, some may require a retention period greater than three years. You would need to create a folder in Outlook or on your departmental drive to store those messages, since archived messages will be deleted from the system after three years. Please refer to the Retention Schedules to determine the appropriate record retention period.

Can I delete or modify items contained within my archive?

No. You may download messages, attachments, forward messages, reply to messages, but in order to achieve full compliance with the retention law, messages contained within the archive cannot be modified or deleted.

Can others view the email contained within the archive folder?

Only as authorized. As in the past, email messages are subject to and may be disclosed under the Open Records Act and rules of discovery in the event of litigation. Authorization to access an archived folder may be granted to an approved manager in the event of an internal investigation.

Is there information that will provide tips on best and safe use of email?

The City has personnel policies/rules at (http://intranet.ci.westminster.co.us/EmpResources/PersonnelRules/Personnel_Policies060809.pdf) and Administrative policy 2007-04 at (<http://intranet.ci.westminster.co.us/AdminMemos/Office/0704.pdf>) that apply to employee communications and the use of City email. There is also a document attached to this email providing some tips and policy reminders.

Occasionally, I receive or send personal email messages. Is it OK to use my City account for personal email?

The City administrative policy 2007-04 states that personal use of the Internet and e-mail should be limited to non-compensable, after-work hours or scheduled breaks. If you have questions on what is reasonable within your department, please talk with your supervisor.

Postini quarantines a lot of spam and bad stuff. Will those items also be included in my archive items?

No. You may still view quarantined items, but those items will not be included in your three-year archive unless you request that the message be released from quarantine for delivery to your City email. In the rare event that a spam message is not blocked by Postini and is received in your inbox, it would become part of your archive items.

I forgot my Postini password. How do I get online to see my archive items?

Simply complete an IT Service Center request (available on the employee Intranet at <http://intranet.ci.westminster.co.us/scripts/it/itsc/default.asp> and an IT staff member will call to assist you in getting your password reset.

If I leave a voice mail message, or receive an email containing a voice mail message attachment, will that be archived and available to listen to at a later date?

Yes, any voice mail messages attached to email will also be archived for a period of three years.

Am I limited in the number of messages that I can store in my archive?

No, there is no limit on the size or number of messages. Postini will provide unlimited storage for City email.

Is the archived email secure?

Postini stores messages in a highly secured production and backup environment.

How can I learn more about the features of the archive email search features?

IT has added a search toolbar on your Outlook program. That toolbar (called Google Message Discovery toolbar) contains a "Help" tab where you may learn more about the features of Postini's archive service. If you do not see the toolbar, click out the Outlook "VIEW" menu, select "TOOLBARS" from the dropdown menu, and click on the "Google Message Discovery Toolbar" to toggle the toolbar on.

EMAIL TIPS AND POLICY REMINDERS

The following may be considered unprofessional or prohibited communication according to the Administrative Memorandum on Electronic Media Access and Acceptable Use Policy and/ or the Personnel Policies. Do not create or forward messages that may be in violation of these policies.

- Negative comments regarding City staff or management.
- Performance criticism.
- Racial or gender slurs.
- Lies about the City's rivals.
- Office gossip. If people want to spread their own news, let them.
- Sarcastic humor. Without inflection or visual cues, it's risky.
- Private matters. Don't e-mail details on any part of your life that you wouldn't want others to read.
- Emails containing libelous, defamatory, offensive, racist or obscene remarks.

Legal researchers and e-discovery practitioners look for key phrases to identify conduct that could be illegal or create liability for organizations. If you are planning to send a message that contains one of the phrases below or similar, or sensitive/confidential information, determine if the information really needs to be communicated and, if so, consider other forms of communication.

- "I could get into trouble for telling you this, but..."
- "Delete this email immediately."
- "I really shouldn't put this in writing."
- "Don't tell So-and-So." Or, "Don't send this to So-and-So."
- "She/He/They will never find out."
- "We're going to do this differently than normal." "I don't think I am supposed to know this, but..."
- "I don't want to discuss this in e-mail. Please give me a call."
- "Don't ask. You don't want to know."
- "Is this actually legal?"

Administrative Memorandum

From: J. Brent McFall, City Manager
Prepared By: David Punttenney, Director of Information Technology
Date: July 6, 2007
No: 2007-04 (Supersedes 2007-02)
Subject: Electronic Media Access and Acceptable Use Policy

PURPOSE

The purpose of this policy is to ensure that privacy, security and legal issues concerning employee use of the Internet and other forms of electronic media through City owned hardware and software systems including e-mail, voice-mail, electronic fax, bulletin boards, forums, blogs and any other electronic communication forum are addressed, and to define appropriate use of these tools. City employees with access to City owned electronic communication tools are responsible for reviewing and following this policy to protect the organization and themselves.

I. Appropriate Uses

Employees are expected and have the obligation to use good judgment at all times when using the Internet and other electronic communication tools. Employees should be professional and courteous when sending electronic messages. Employee use of electronic media must also comply with the City's Personnel Policy and Rules. Electronic media is made available to employees to provide an effective method to communicate, increase productivity, perform research and obtain information that will assist in performing job-related tasks. Personal use of the Internet and e-mail should be limited to non-compensable, after-work hours or scheduled breaks. Examples of appropriate use of electronic media may include tasks such as:

1. Accessing external databases to obtain job-related data.
2. Disseminating appropriate City documents to other individuals or organizations.
3. Participating in e-mail groups, forums and blogs that may provide insight and assistance for job-related functions.
4. Communicating with other City employees.

5. Communicating with other professionals with similar issues and jobs to share ideas and problem-solve.
6. Obtaining information from vendors on products and services.

II. Prohibited Uses

Examples of prohibited use of electronic media are listed below:

1. Transmitting any material or messages in violation of Federal, state, local law, ordinance, jokes, slurs, etc. Employees who receive e-mail messages that may contain sexually, racially or ethnically inappropriate or offensive materials **from other City employees** should notify their immediate supervisor. Employees are prohibited from forwarding or printing such messages, unless necessary to advise a supervisor.
2. Storing in hard copy or electronic form any document, photo, video clip, audio file, executable file, etc., that may contain materials that would be considered sexually, racially or ethnically offensive. Storage of these types of materials for any reason other than official City business purposes is strictly prohibited.
3. Intentional distribution of sensitive or confidential information to inappropriate parties.
4. Distributing unauthorized broadcast messages or solicitations (spam).
5. Accessing or distributing offensive or pornographic materials.
6. Using City-provided electronic media to accomplish personal gain or to manage a business. Employees engaging in a personal business or promoting sales of business or personal items must establish a personal e-mail account and handle such business on personal time.
7. Distributing copyrighted materials not owned by the City, including software, photographs, or any other media.
8. Downloading of copyrighted information or software without IT Management approval.
9. Developing or distributing programs that are designed to infiltrate computer systems internally or externally.
10. Accessing or downloading any resource for which there is a fee without prior appropriate approval.
11. Representing yourself as another user or employee.
12. Attempting to access any system which an employee is not authorized to access (hacking).
13. Giving your username and password to anyone for any purpose unless authorized by a supervisor for business purposes.
14. Mailing inappropriate e-mail from external e-mail accounts to any internal employee e-mail account.

15. Frequently using e-mail or the Internet for personal use during normal work hours. Personal communications should be conducted either before or after work, or during breaks. Habitual excess personal use during working hours is cause for disciplinary action.
16. Using the City's e-mail distribution lists to distribute e-mail containing unsolicited personal views or concerns regarding City policies, decisions or other employees. Employees are encouraged to discuss concerns or questions regarding City policy or decisions directly with their supervisor, Division Manager or Department Head as needed.
17. Subscribing to distribution lists or automated e-mail services to receive advertising or other non-job related materials or information is prohibited due to the network, computer and staff resources required to handle inbound e-mail.
18. Creating or updating personal web sites or blogs.
19. Participating in blogs, chat rooms, instant messaging or forums for non-work related purposes.

III. Software

Much of the information located on the Internet is software subject to the provisions of the Federal Copyright Law. Creating illegal copies of software or distributing software to third parties is not permitted. Employees are responsible for using software in accordance with applicable license agreements.

IV. Public Records

Under many circumstances, digitally stored data and employee correspondence in the form of electronic communications, (including but not limited to e-mail and voice mail), may be a public record subject to inspection under the Open Records Act as well as other federal and state laws. public records law. Any e-mail sent in an employee's capacity as a representative of the City should reflect the same care, thoughtfulness and professionalism as the employee would use in sending the same correspondence on City letterhead.

V. Monitoring

The City monitors overall e-mail usage and occasionally views individual messages or attachments to protect the City against inappropriate use and to prevent the distribution and spread of viruses inside and outside the City's system.

The City reserves the right to disclose the contents of employee e-mail messages, and will do so when it has a legitimate business need.

Legitimate business needs may include, but are not limited to, the following:

1. Investigation of suspected misuse of electronic media.
2. Investigation related to pending or anticipated litigation.
3. System administration and maintenance.
4. Compliance with City policy, applicable laws, ordinances or court orders.

VI. Privacy

Employees should have no expectation of privacy in either sending or receiving electronic text or voice mail messages and other information on the Internet or other electronic media. Electronic media, specifically the Internet and e-mail, are not a secure communication network, and personal or privileged information sent via these media could potentially be read by individuals other than the desired recipients. Employees needing to send confidential information such as social security numbers, medical information, or passwords to an outside organization should contact the Information Technology Department to determine how to best ensure privacy of data. Inbound and outbound messages may be viewed by e-mail administrators while handling virus prevention and content screening responsibilities.

Employees using a public access PC to connect to Lancelot (Outlook Web Access) may compromise the confidentiality of their login name and password when another party electronically intercepts that information. Following connection to Lancelot via a public access PC, employees should change their password as soon as possible through a City network connected computer.

Employees using electronic media have the responsibility to respect the privacy and rights of others, and should not intentionally seek information on, obtain copies of, or modify files, communications, passwords and other data that belong to other users.

E-mail messages and associated text or voice attachments transmitted via the Internet may be stored on other non-City systems, and may be available for review and distribution even when the original message has been deleted from all City systems.

VII. Electronic Communication After Hours

The City of Westminster has established personnel and administrative policies concerning employee communications after hours. Many of these policies, such as participation in political activities, apply to employees both during and after work hours. It is important for

employees to understand these policies and their responsibilities as a City employee when participating in blogs, forums, email discussions, and other types of electronic communications. Any questions concerning these policies should be directed in the first instance to the employee's supervisor.

DOCUMENT MANAGEMENT USERS COMMITTEE

The Document Management Users Committee consists of representatives from each Department. A current list of committee members can be found on the City Intranet.

Committee members are considered experts on the scope and content of their department or division's records and should be the first point of contact when responding to an open records request involving records maintained by their division or department.

Employees should contact their Committee members for assistance in understanding the City's Document Management and Retention Policy and applying the retention schedules contained therein.



WESTMINSTER

**ATTACHMENT TO ORIGINAL CONSTRUCTION CONTRACTS
ON FILE IN CITY CLERK'S OFFICE**

The remaining Contract Documents that comprise the entire Contract between the
City and _____
(Contractor Name)

dated _____ for _____
(Project)

are on file in the office of:

City Project Mgr: _____

Title: _____

Department: _____

Said Contract Documents include the following:

Document:

Check:

- | | |
|---|--------------------------|
| Request for Bids | <input type="checkbox"/> |
| Instructions to Bidders | <input type="checkbox"/> |
| Bid Bond | <input type="checkbox"/> |
| Bid Proposal | <input type="checkbox"/> |
| Bid Schedule | <input type="checkbox"/> |
| Notice of Award | <input type="checkbox"/> |
| Notice to Proceed | <input type="checkbox"/> |
| Contract Drawings | <input type="checkbox"/> |
| Performance Bond | <input type="checkbox"/> |
| Payment Bond | <input type="checkbox"/> |
| General Conditions, incl. Table of Contents | <input type="checkbox"/> |
| Special Conditions | <input type="checkbox"/> |
| Addendum | <input type="checkbox"/> |
| Specifications | <input type="checkbox"/> |
| Change Orders | <input type="checkbox"/> |
| Insurance Certificates | <input type="checkbox"/> |
| Tax-Exempt Certificates | <input type="checkbox"/> |
| Other: (list) | <input type="checkbox"/> |

NOTE: Documents listed above shall be transmitted to the City Clerk's Office upon project completion for retention pursuant to the City's document retention schedule.

Document Management and Retention Glossary

Certificate of Destruction – A certification that documents the destruction of specific records in conformity with the City’s formally established retention policies and retention schedules.

Confidentiality – The protection of information so that unauthorized people, resources, and processes cannot access the information.

Confidential Records – Confidential records generally contain information that relates to activities of the City that are exempt from release under the Colorado Open Records Act or are exempt due to attorney-client privilege. See Protection of Personally Identifiable Information and Confidential Records section of the Policy.

Custodian of Records – The City Clerk is the Custodian of all papers, documents, and records pertaining to the City. City Charter §4.11(b).

Document Management & Retention Policy – Policy adopted by City Council pursuant to Resolution No. _____, Series 2011.

Historic Records – Records having permanent business, research, or historical value, regardless of media. Examples of historic records are: final and adopted budgets, census records, Council minutes and resolutions, land and property ownership records, and ordinances.

Intrinsic Historic Value – Records, physical items and artifacts that have intrinsic historic value due to the nature of the records itself. Examples of intrinsic historic valued records and artifacts are: the original City Charter, handwritten Council meeting minutes, official flags and banners, photographs and recordings of historical events, plaques, trophies, and other awards, scrapbooks, news clippings, and the City seal.

Litigation Hold – Term used to indicate that certain records and information cannot be destroyed, even if otherwise permitted by the records retention schedule, because they are subject to legal action, litigation, or government investigation. See Litigation Hold section of the Policy.

Litigation Hold Release – The process used by the City Attorney to notify employees that the litigation hold is removed on documents whose destruction was suspended due to a litigation hold. The records are put back into normal retention once released. See Litigation Hold section of the Policy.

Non-Records – Materials that have no public record retention value that may be disposed of as soon as they have served their purpose at the discretion of the custodian and that have no operational, legal, fiscal, or historical value. See Non-Records section of the Policy.

Official Record Office (ORO) – The department or division that is the official custodian of the official copy of the record. See ORO Code section of the Policy.

Permanent Records – Records with a permanent retention period. These records have permanent business, research, or historical value and may be candidates for historic preservation. See Permanent Records section of the Policy.

Personally Identifiable Information (PII) - Any information that can be used to identify or contact an individual or used to identify an existing, previous or prospective employee and independent contractor. Examples of PII are: full name, social security numbers, credit card number, home address, personal email address, and phone number (home or mobile).

Records – Information created, received, and maintained as evidence and information by an organization or person, in pursuance of legal obligations or in the transaction of business. Records contain information that has operational, legal, fiscal, vital or historical value and are irrespective of media or physical characteristics.

Document Retention Schedule – A document that is approved by the City Council and is a comprehensive list of record series titles and establishes retention periods and disposition requirements for all the City's records, regardless of media or physical characteristics. See Document Retention Schedule section of the Policy.

Retention Period – The amount of time a record must be retained before disposition or destruction.

User's Committee – Group of Official Record Officers designated by department heads and/or division managers as the responsible employee(s) to satisfy Open Records requests and quarantine records when a Litigation Hold has been issued by the City Attorney's Office. The User's Committee meets periodically to discuss and resolve common document management issues and to propose updates to the Document Retention Schedule. See Users' Committee section of the Policy.



WESTMINSTER

Staff Report

City Council Study Session Meeting
April 18, 2011



SUBJECT: Resource Management Program for City Parks

PREPARED BY: Richard Dahl, Park Services Manager
Jerry Magnetti, Park Supervisor

Recommended City Council Action

Provide feedback and support to Parks, Recreation and Libraries Staff on the proposed reallocation of resources for the purpose of maintaining the City's parks system.

Summary Statement

The City of Westminster Department of Parks, Recreation and Libraries has prided itself on the highest quality of maintenance throughout the parks system since the Department was first established in 1974. However, recent economic conditions have changed the reality of what can be accomplished with fewer staff and reduced operating budgets for the foreseeable future. As such, the Park Services Division is proposing to initiate a tier maintenance program that better allocates resources, is sustainable and maximizes their effectiveness throughout the parks system.

Staff will be in attendance at the Study Session Meeting to make a brief presentation explaining the proposed program and will be available to answer questions.

Expenditure Required: \$ 0

Source of Funds: N/A



Policy Issue

Should City Council direct Staff to manage its park operations based on a tier system that ranks park maintenance based on resource management, need and priority?

Alternatives

- 1) Continue with park maintenance operations as in years past and try to make do with staffing and existing budgets. Staff does not recommend this approach as it is important to have a plan in place that is systematic in its approach so internal and external pressures do not lead to an incoherent and random resolution to the problem.
- 2) Direct Staff to re-evaluate the maintenance plan and provide other alternatives for Council to evaluate. This process could be time consuming especially with the upcoming maintenance season so close at hand. Staff believes the approach set forth in this Staff Report will continue to provide a high level of maintenance for the City's most visible and highly used parks, while still providing an appropriate level of maintenance for the remainder of the parks systems.

Background Information

With reductions in personnel and operating budgets, Park Services Staff was required to review goals, operating procedures and maintenance criteria to match the resources available to the Division. As such, Staff has developed a plan (See attached maintenance area list/map) that established four different service levels for the City's parks based on visitation, reservation availability, recreation programs and classifications including:

- Facilities and citywide parks
- Community parks
- Neighborhood parks
- Greenbelt/detention ponds and right of ways

Staff is aware some park users or neighbors may be upset and may believe their favorite park or service has been singled out or that it is no longer valued. This is not the case; however, given the resources available to the City, it is no longer possible to provide the same level of service as in years past.

Listed below are the proposed Tier Service Levels. These are meant to be general guidelines. Staff will continue to use discretion to assure the upkeep and long term viability of the parks systems and other green spaces at City facilities.

Tier 1 Service Level

Description

- All occupied city facilities: City Hall complex, fire stations, recreation centers, libraries
- Citywide parks (51 to 250 acres - City Park is the only park in this category)
- Parks with reserveable picnic shelters
- High-use parks
- Formal sports/athletic fields
- Parks with established City-sponsored recreation programs occurring throughout the year

Irrigation

- Frequency and amount follows rainfall, temperature and turf demands
- Turf is to look green and healthy
- Irrigation cycles not to exceed four to six cycles per week at 100% of need

Mowing

- Mowing at least once per week (five working days) or twice, if necessary, based on turf growth
- Edging and trimming as scheduled
- Native or natural areas to be left in an un-mowed state except for perimeter mowing along fence lines - Mowing can be done if there is a fire hazard or as a mechanical means of weed control

Shelter Maintenance

- Clean and wash once per week or more if reservations require

Fertilizer Application

- Apply once per year as budget allows

Litter/Trash Removal

- Every day during the high-use season and three times per week during off season

Weed Spraying/Control

- Twice a year or as needed

Tier 2 Service Level

Description

- Community parks (15 – 50 acres)
- High to moderate use
- Reserveable shelters
- No programmed activities
- No formal or regular scheduled use

Irrigation

- Four to six cycles per week at 80% of need
- Park will look green and healthy if average rainfall is received
- Mild stress areas will occur in hot, dry and windy conditions

Mowing

- Mowing at least once per week (five working days) or twice if necessary based on turf growth
- Edging and trimming as scheduled
- Native or natural areas to be left in an un-mowed state except for perimeter mowing along fence lines - Mowing can be done if there is a fire hazard or as a mechanical means of weed control

Shelter Maintenance

- Check weekly
- Clean and wash as necessary

Fertilizer Application

- Apply once per year as budget allows

Litter/Trash Removal

- Three times per week or as needed

Weed Spray/Control

- As needed

Tier 3 Service Level

Description

- Neighborhood parks (0.5 – 14 acres)
- Lower use
- Not destination facilities

Irrigation

- Two to four cycles per week at 75% of need
- Park will be green early and late in season with cooler weather
- Park will show stress in hot and dry times

Mowing

- Mowing once per week.
- Edging and trimming as needed
- Native or natural areas to be left in an un-mowed state except for perimeter mowing along fence lines - Mowing can be done if there is a fire hazard or as a mechanical means of weed control

Shelter Maintenance

- Check weekly
- Clean and wash as necessary

Fertilizer Application

- Once every two years (alternating with remaining tier 3 parks)

Trash/Litter Removal

- Two times per week
- Additional service as necessary

Weed Spray/Control

- As needed spot spraying

Tier 4 Service Level

Description

- Greenbelts
- Detention Ponds
- Right of ways
- Native or natural areas to be left in an un-mowed state except for perimeter mowing along fence lines

Irrigation

- Reduced to lowest levels based on moisture content - At designated sites, i.e., Mayfair greenbelt, Oakhurst detention pond, etc., irrigation may be completely turned off

Mowing

- Mowing can be done if there is a fire hazard or as a mechanical means of weed control

Shelter Maintenance

- N/A

Fertilizer Application

- None

Trash/Litter Removal

- As needed
- Done by volunteers if possible

Weed Spray/Control

- Spot spray noxious weeds only

The proposed Resource Management Program for City parks supports the City's Strategic Plan goals of "Financially Sustainable City Government Providing Exceptional Services," "Vibrant Neighborhoods in One Livable Community," and "Beautiful and Environmentally Sensitive City."

Respectfully submitted,

J. Brent McFall
City Manager

Attachment

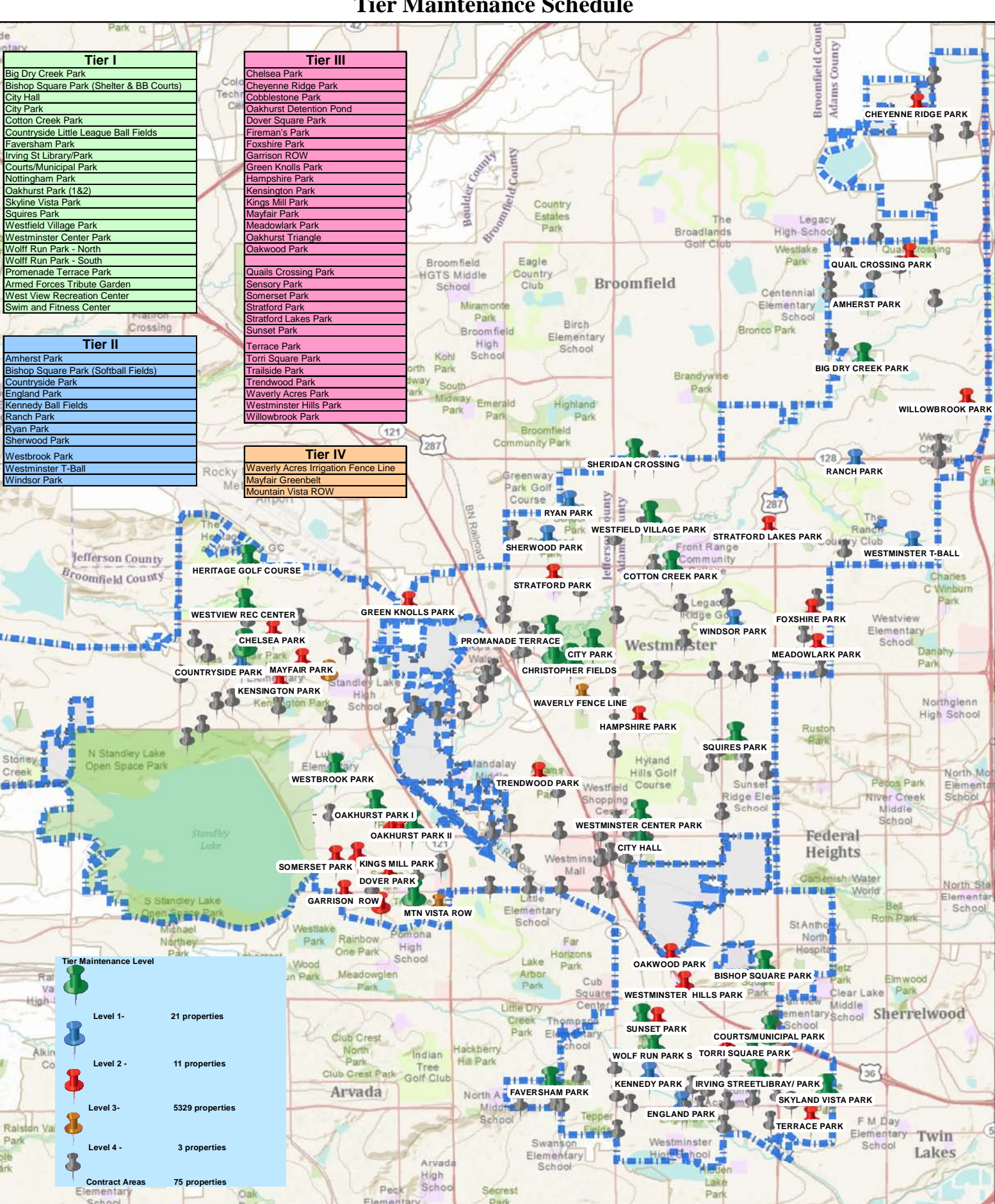
Westminster Parks Tier Maintenance Schedule

Tier I
Big Dry Creek Park
Bishop Square Park (Shelter & BB Courts)
City Park
Cotton Creek Park
Countryside Little League Ball Fields
Faversham Park
Irving St Library/Park
Courts/Municipal Park
Nottingham Park
Oakhurst Park (1&2)
Skyline Vista Park
Squires Park
Westfield Village Park
Westminster Center Park
Wolff Run Park - North
Wolff Run Park - South
Promenade Terrace Park
Armed Forces Tribute Garden
West View Recreation Center
Swim and Fitness Center

Tier III
Chelsea Park
Cheyenne Ridge Park
Cobblestone Park
Oakhurst Detention Pond
Dover Square Park
Fireman's Park
Foxshire Park
Garrison ROW
Green Knolls Park
Hampshire Park
Kensington Park
Kings Mill Park
Mayfair Park
Meadowlark Park
Oakhurst Triangle
Oakwood Park
Quails Crossing Park
Sensory Park
Somerset Park
Stratford Park
Stratford Lakes Park
Sunset Park
Terrace Park
Torri Square Park
Trailside Park
Trendwood Park
Waverly Acres Park
Westminster Hills Park
Willowbrook Park

Tier II
Amherst Park
Bishop Square Park (Softball Fields)
Countryside Park
England Park
Kennedy Ball Fields
Ranch Park
Ryan Park
Sherwood Park
Westbrook Park
Westminster T-Ball
Windsor Park

Tier IV
Waverly Acres Irrigation Fence Line
Mayfair Greenbelt
Mountain Vista ROW



Tier Maintenance Level	
	Level 1 - 21 properties
	Level 2 - 11 properties
	Level 3 - 5329 properties
	Level 4 - 3 properties
	Contract Areas - 75 properties

Total 169 Properties

1 inch = 6,000 feet

