

Table 1 - Illegal Dumping Initiative Strategy Table — September 2022 Updates

Educate Prevent Clean-up Enforce	#	CCC Illegal Dumping Initiative Strategies	Only if #	Dept. (Bold = Lead)	<p align="center">September 2022 Think Tank Updates <i>(Italicized blue text carried over from past updates)</i> Yellow highlighting denotes new updates</p>
EDUCATE	EXISTING - NO PROPOSED CHANGES				
	1	Countywide Recycling Hotline & Website - Legal options to discard unwanted items/trash		DCD	<i>(Existing)</i>
	2	Printed Outreach Materials by Franchise Haulers - Annual Mailer/Newsletters, Bill Inserts & Bill Messages.		DCD	<i>(Existing)</i>
	EXPAND - PROPOSED CHANGE TO EXISTING				
	3	Educate persons living or working in the unincorporated area that only hauling companies approved by the County (permitted or franchised) can legally be hired to pick-up trash.		CCEH, DCD	<i>CCEH provides content for JPA Newsletters (Recycle Smart and Recycle More) to promote & educate hauler program & reasoning for using permitted haulers. To date, eight haulers have been fully permitted. Please visit CCEH's website to find the latest Permitted Haulers: https://cchealth.org/eh/solid-waste/non-franchise-permit.php.</i>
	4	Seek additional opportunities to raise awareness about and increase utilization of the Bulky Item Pick-up services and/or extra waste pick-ups offered upon request at no additional charge for residential customers within the County's unincorporated franchise areas.		DCD	<i>DCD has compiled data regarding utilization of residential on-call Bulky Item Pick-up services and Extra Bagged Waste Pick-ups to inform and prioritize future outreach efforts. Based on this data, DCD will determine if participation is increasing vs. decreasing, as well as whether participation rates differ significantly from one community to the next within individual Franchise areas. This is one of the services intended to be promoted as part of the "How to do the right thing" outreach campaign effort (Strategy 5).</i>
NEW					
5	<p><u>Create public outreach campaign(s)</u> with messaging that is effective for applicable target populations (may need carrot & stick since some respond better to one vs. the other) that can be deployed using these various methods:</p> <ul style="list-style-type: none"> * Curbside haulers – Mail/Robo-calls/E-Blasts/Direct Face-to-Face or Phone contact * Supervisors’ offices – Newsletters/E-Blasts/Direct Face-to-Face or Phone contact * On-line – Social Media (posts & ads) and Digital (internet ads) * Web/Mobile App - Curbside and local reuse & recycling services/facilities * News Media – Print, Radio & TV * Word-of-Mouth (most effective) – Engage community leaders/members/groups to raise awareness (including Youth – e.g. boy/girl scouts, Seniors, Community based non-profit organizations and Religious & philanthropic groups) 		CCEH, PWD, DCD, SO	<p>CCCWP partnered with the Illegal Dumping Initiative to create an engaging video that explains what illegal dumping is, the issues and causes, how it impacts our county, informs the public about how to properly dispose of commonly illegal dumped items, and how to report illegal dumping. The video can be viewed on Youtube at https://youtu.be/7CaPFM_9CqQ</p> <p>It has been posted on CCCWP and DCD Social Media Accounts, and was featured on the 1st Episode of "Inside Public Works" which premiered on Tuesday, 5/17/22 at 7:00 p.m. with 10 more airings that followed throughout the months of May & June on CCTV.</p> <p>\$220,000 in Clean California Local Grant Program funding was awarded to continue implementation of this strategy.</p>	

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PREVENT	EXISTING - NO PROPOSED CHANGES				
	6	Fencing off road right-of-way dumping hot spot if/when deemed necessary		PWD	Chainlink fencing was installed on the south side of Treat Blvd. between Cherry Lane and Walnut Creek to prevent trespassing and illegal dumping. Concerned residents contacted Sup. Mitchoff who requested to block access. Chainlink fence was installed and completed during the week of August 1.
	7	Franchise Hauler provided Community Clean-up Boxes		DCD	<i>(Existing)</i>
	8	Franchise Hauler provided On-call Extra Bagged/Bundled Pick-ups for residential customers (not available to multi-family)		DCD	<i>(Existing)</i>
	9	Franchise Hauler provided On-call Bulky Item Pick-ups for residential customers in three of the four County Franchise areas (not available to multi-family)		DCD	COMPLETE <i>(Existing)</i> <i>County's Franchise Agreement with Garaventa Enterprises was recently amended to among other things expand on-call services, and require the company to start offering all residential customers one Bulky Item Pick-up per year upon request, at no additional charge.</i>
	10	CalGreen Mandatory Waste/Recycling Tracking & Reporting for covered projects		DCD	<i>(Existing)</i>
11	Coordinate with Resource Conservation District about grant awarded for rural illegal dumping site abatement (for agricultural lands)		DCD	<p>The Contra Costa RCD currently addresses projects and issues like this through the CalRecycle Farm and Ranch Solid Waste Cleanup and Abatement Program. The next round of applications is due November 10th</p> <p>Funding through this program can support:</p> <ul style="list-style-type: none"> •The removal of ongoing or collected illegal dumping •Construction of prevention measures like fences, gates, lights, signage, etc. •Reimbursement for past illegal dumping cleanup with sufficient evidence like receipts, photos, etc. <p>More information can be found at https://calrecycle.ca.gov/LEA/GrantsLoans/FarmRanch/ and https://calrecycle.ca.gov/lea/grantsloans/farmranch/fy202223/</p>	

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PREVENT	EXPAND - PROPOSED CHANGE TO EXISTING				
	12	<u>Mandatory Subscription Ordinance</u> - Expand current complaint based enforcement to proactive enforcement using franchise hauler provided lists		CCEH	A revised draft procedure for the mandatory subscription process was submitted to County Counsel for review and the advice that was received back was that the ordinance, specifically the due process around liening properties, is severely outdated and no longer compliant with current Government Code requirements. They also advised that we use the existing Uniform Abatement Process found in the ordinance for the lien process until revisions can be done to the mandatory subscription sections of the ordinance. We are working on process revisions to the lien process based on the recommendations of county counsel. Notices of violation and mandatory subscription signups are still happening in the meantime, but no property liens are currently being processed.
	13	Implement lien process provided for under the County's <u>Mandatory Subscription Ordinance</u> to provide for recovery of costs resulting from forced starts.		CCEH	A revised draft procedure for the mandatory subscription process was submitted to County Counsel for review and the advice that was received back was that the ordinance, specifically the due process around liening properties, is severely outdated and no longer compliant with current Government Code requirements. They also advised that we use the existing Uniform Abatement Process found in the ordinance for the lien process until revisions can be done to the mandatory subscription sections of the ordinance. We are working on process revisions to the lien process based on the recommendations of county counsel. Notices of violation and mandatory subscription signups are still happening in the meantime, but no property liens are currently being processed.
	14	Seek-grant funding when offered through CalRecycle's waste tire grant program to subsidize Waste Tire Amnesty Day events.		CCEH	<i>Waste Tire Amnesty Day Grants have been awarded, but our county was not chosen as a recipient for grant funding. These grants are on a 2 year cycle and the next opportunity to apply should be in spring 2023.</i>
15	Establish and enforce extended producer responsibility ordinances - Require businesses that make/sell items that are commonly dumped or costly and challenging to dispose of properly to accept old items at the end of product life.		CCEH, DCD	Inmar, a safe drug stewardship organization, has received plan approval and completed plan implementation. They are the second organization with a fully approved and implemented stewardship plan along with Med-Project.	

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PREVENT	16	Maximize existing creek clean-up and/or community clean-up opportunities - Evaluate existing and past usage of clean-up boxes provided for in the County's Franchises to target usage where need is the greatest for maximum effectiveness.		DCD, PWD	Utilization of community clean up boxes so far in 2022: -The Republic/Crockett Franchise includes five 20-cubic yard boxes per year. In 2024, three of the five were used. -The Republic/RSS Franchise includes sixteen 20-cubicyard boxes per year. - The Republic/Allied franchise has scheduled the following community clean up events: October 29 - Pacheco/Mt. View/Vine Hill (six to eight 20- November 5 - Bay Point (eight 20-yard boxes slated) -The Garaventa/MDRR franchise has held/scheduled the following community clean up events: May 7 – Bay Point (eight 40-yard boxes used) September 10 – Knightsen (ten 40-yard boxes used) October 8 – Bethel Island (twenty 40-yard boxes slated) October 29 – Byron (five 40-yard boxes slated)	
	17	Implement additional community clean-ups - Identify where additional clean-ups may be needed/warranted and seek to arrange clean-up box services through the applicable County franchise hauler or seek assistance through applicable agency where the County does not control the Franchise. (Future Phase)		DCD	\$135,000 in Clean California Local Grant Program funding was awarded to continue implementation of this strategy.	
	18	Seek additional free e-waste pick-up options (Curbside Haulers or Free Recyclers) (Future Phase)		DCD	<i>(Future Phase)</i> <i>Minimal e-waste dumping therefore no immediate need warranting action at this time.</i>	
	NEW					
	19	Explore amending the County's <u>Mandatory Subscription Ordinance</u> to streamline process for forcing service starts and facilitating lien as means of reimbursing hauler for mandated services without County having to incur cost first.		CCEH	Given the issues with the mandatory subscription ordinance laid out above, this item, if possible, will likely not be addressed until the mandatory subscription ordinance is in the revision process.	
	20	Offer option of disposal vouchers in lieu of on-call pick-ups for those who prefer. (Future Phase)		DCD	<i>(Future Phase)</i> <i>Can only be pursued during rate setting time.</i>	
21	Subsidize free disposal vouchers or free disposal day at landfill/transfer station. (Future Phase)		DCD	<i>(Future Phase)</i> <i>Can only be pursued during rate setting time.</i>		

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PREVENT	22	Explore switching some on-call pick-ups for extra bagged waste to scheduled clean-up days to increase participation. <i>(Future Phase)</i>		DCD	<i>(Future Phase)</i> <i>Can only be pursued during rate setting time.</i>
	23	Seek to identify local disposal option for treated wood self-hauled by the general public; more being dumped since in-County Transfer Stations don't accept it. Closest option for public self-haul is in Livermore.		DCD, CCEH	The Contra Costa Waste Services transfer station located at 1300 Loveridge Rd. in Pittsburg accepts treated wood waste.
	24	Seek to identify feasible options for proper disposal of unwanted Recreational Vehicles, Trailers & Boats.		DCD, SO	A Measure X investment of \$150,000 was approved by the Board of Supervisors on November 16, 2021 to continue implementation of this strategy.
	25	Secure commitment(s) to establish <u>free local recycling drop-off sites for mattresses and box springs</u> through participation in the statewide Bye Bye Mattress program - Work with transfer stations and/or other appropriate sites/operators, consistent with neighboring counties.		DCD, PWD	DCD is pursuing a Sole Source Environmental Justice Funding Opportunity offered by Mattress Recycling Council to establish a free local recycling drop-off sites for mattresses and box springs. Project must be located in low-income minority neighborhoods or environmental justice neighborhoods with higher rates of illegal mattress dumping in Contra Costa County. Project must align with following criteria: <ul style="list-style-type: none"> • Enhancement of the overall beauty and/or infrastructure; • A visible community improvement; • Project alleviation of illegal dumping of mattresses and other blight; • Project sustainability with amount of funds granted; and • Describe collaboration with other community groups and/or County departments.

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PREVENT	26	Install street signs with info about How To Report posted at key entry ways or at/near dumping Hot Spots so people are reminded how to take the desired action. <i>(Initial Phase - 50 signs @ \$200/each)</i>	45	PWD	\$10,200 in Clean California Local Grant Program funding was awarded to continue implementation of this strategy. PWD is coordinating with the SO to finalize a list of sign locations for installation. SO reached out to resident deputies from station houses throughout the county and compiled signage locations for consideration: -West- 7th/Grove 4th/Grove Fred Jackson/ Market Vernon/ Battery Brookside/ Fred Jackson Cummings Skyway McEwen Rd Alhambra Valley/ Bear Creek -Central- Wildcat Canyon/ San Pablo Dam Rd -East- Marsh Creek/ South of Vineyard Camino Diablo/ Marsh Creek Camino Diablo/ Walnut Deer Valley/ Chadborne
	27	Identify capital improvements that may be needed, such as street lighting or barricades. <i>Initial Phase - Currently developing initial phase targeting Bay Point, involves 10 street lights in two specific areas.</i>		PWD	A Measure X investment of \$200,000 was approved by the Board of Supervisors on November 16, 2021 to continue implementation of this strategy. \$4,800 in Clean California Local Grant Program funding was awarded to continue implementation of this strategy.
CLEAN-UP	EXISTING - NO PROPOSED CHANGES				
	28	Blow & Flow Litter Removal (Roads & Creeks)		PWD	<i>(Existing)</i>
	29	Street Sweeping		PWD	<i>(Existing)</i>
	30	Volunteer driven litter removal/consolidation through the Adopt-a-Road Program		PWD	<i>(Existing)</i>

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CLEAN-UP	31	Solid Waste Facility Operator Off-site Litter/Debris Removal: North Richmond Hot Spot Crew Weekday Route & Routine Litter Policing by Transfer Stations & Landfill		DCD	<i>(Existing)</i>	
	32	Sheriff's Office: Building community trust & pride in Bay Point by assisting with removal of illegal dumping (free disposal at Transfer Station outside Martinez)		SO	<i>(Existing)</i>	
	EXPAND - PROPOSED CHANGE TO EXISTING					
	33	Assist with hauling and removal of waste tire piles illegally dumped in the public right-of-way on an as needed basis. CCEH staff will haul away piles of up to 35 waste tires, however they can partner with the local conservation corps to clean-up large waste tire piles (36 waste tires or more) illegally dumped on public lands.		CCEH	CCEH continues to pick up and dispose of illegally dumped tire piles of 35 tires or less. 272 illegally dumped tires were picked up by CCEH staff and disposed of between 7/1/21 and 6/30/22. In addition, CCEH worked with CivicCorps to dispose of 844 illegally dumped tires in that same time period.	
	34	Franchise Hauler provided On-call <u>Right-of-Way Debris Removal</u> : Establish service in the one County Franchise area not currently implemented -and- Increase area (currently in place for three of the County's four Franchises) and potential scope/frequency		DCD	<i>Complete</i>	
	35	Public Works: Dumping in creeks, roadways outside County Franchise Areas where hauler provides on-call removal service and hazardous waste or oversized items not serviced by the Franchisees. Potential for increasing removal frequency within the existing budget (\$400K) is dependent upon reducing the area Public Works is responsible for (limit to areas outside County Franchise authority).	34	PWD	Right-of-way pickup services are performed by franchise haulers and PWD maintenance crews. PWD also provides right-of-way pickup through the use of a contractor administered by Contra Costa County Watershed Program.	
	36	Utilize and make available on-line reporting tool to supplement 1-800-No-Dumping tip line to make it easy for people to report illegally dumped waste in the right-of-way, including ability to upload photos and location coordinates. <i>(Currently pilot testing)</i>		PWD	<i>Complete</i> PWD has launched "Mobile Citizen", a user-friendly smart phone (Android, iOS) mobile application to help residents "on the go" report non-emergency concerns including illegal dumping in unincorporated communities. With Mobile Citizen, residents can simply select illegal dumping, take a photo, provide comments, details about location and then submit. The submitted request is automatically assigned a unique Work Request number and then sent to the appropriate division of Public Works for follow up. A new "Mobile Citizen" web page has been added to the County's website: https://www.contracosta.ca.gov/7875/Mobile-Citizen	
	37	Coordinate/support more volunteer creek clean-ups if needed. <i>(Future Phase)</i>		PWD, DCD	<i>(Future Phase)</i>	

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CLEAN-UP	38	Expand the volunteer Adopt-a-Road program to include adopting spots/blocks. <i>(Future Phase)</i>		PWD	<i>(Future Phase)</i> PWD will continue to explore expanding the program to include adopting spots/blocks. We have already done some of this as we have been flexible with adopters who want to adopt a defined area smaller than the program's 2 mile segment minimum. We will continue to meet with MACs and subcommittees as interest dictates.	
	NEW					
	39	Explore how Franchise Haulers might assist with cleaning up illegal dumping in areas beyond the road right-of-way. <i>(Future Phase)</i>		PWD, DCD	<i>(Future Phase)</i>	
	40	Make arrangements with abatement contractors/towing companies for removal of the approximate 48-50 derelict boats/RVs that have been identified by Sherriff's Office.		CCEH, DCD, PWD, SO	\$150,000 in Clean California Local Grant Progam funding was awarded to continue implementation of this strategy and begin graffiti abatement. As of August 2022, 26 RV's have been abated at the total cost of \$64,509.03	
ENFORCE	EXISTING - NO PROPOSED CHANGES					
	41	Regulate Solid Waste Haulers & Facilities: Oversee Non-Franchise Waste Hauler Permitting (County Code Chapter 418-2) and Enforce State Minimum Standards for Solid Waste Facilities: Illegal Transfer Stations. Continue working with potentially interested cities and encourage remaining cities to pursue adoption of model ordinance designating the CCEH as City's enforcement agency.		CCEH	No other cities expressing interest on adopting the non-franchise hauler ordinance since the previous update.	
	EXPAND - PROPOSED CHANGE TO EXISTING					
	42	Proactively go after uncovered loads on the road and parked on street.	45	SO, CHP	Lt. Terrill and Deputy Haley worked on an uncovered load / illegal dumping and related sections of the vehicle code easy reference sheet. The information was sent to all Stations in the Sheriff's Office and distributed to patrol deputies. This should create a more proactive	
	43	Establish process for identifying and using any address containing evidence located in illegally dumped waste to contact the potentially responsible party in order to find out if there is cause for further investigation, encourage them to remove the material to avoid further follow-up regarding the matter and/or simply inform them that enforcement resources are dedicated to this issue and will be aware of and follow-up if found to recur.	45	DCD, PWD, CCEH, SO, DA	<i>Strategy implementation pending the hiring of per diem deputies under Strategy #45</i> <i>Persons involved in removing illegal dumping from the right of way in North Richmond are already gathering address containing evidence when found which is then tracked in centralized database and provided to the Resident Deputy assigned to act as the North Richmond Illegal Dumping Officer for further investigation. While the per diem deputy hiring process is underway, staff intends to seek similar address evidence gathering assistance from the various entities involved with the removal of illegally dumped debris from the right of way in the remainder of the County (includes Franchise Haulers, PWD crews and Adopt-a-Road volunteers).</i>	

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ENFORCE	44	Establish process and parameters for pursuing misdemeanor conviction/penalty provided for under County Code Chapter 418-7 for persons hauling waste routinely generated from unincorporated residences & commercial establishments.	45	DCD, SO, DA	<i>Strategy implementation pending the hiring of per diem deputies under Strategy #45.</i>	
	NEW					
	45	Dedicate four per-diem deputies (combined total of 3,600 hours per year; equivalent to approx. 1.73 FTE) to investigating dumping crimes.		SO	#45 The Sheriff's Office currently has one Per Diem Deputy currently assigned to illegal dumping. He has been identifying problem areas for additional enforcement, signage, or possible camera surveillance, throughout the county. January-August Highlights: -163 submissions thru Mobile Citizen App. for clean-up. -11 cases with 1 citation submitted to DA for filing. - 4 new surveillance cameras have been installed throughout the county, and will be going live soon. A Measure X investment of \$150,000 was approved by the Board of Supervisors on November 16, 2021 to continue implementation of this strategy.	
46	Wireless high definition, license plate reader <u>surveillance cameras</u> with night vision, infrared & solar powered. Remote-controlled to zoom and capture evidence – Place at key entry ways or at/near hot spots. PILOT: <i>Initial pilot of surveillance monitoring service for five rental cameras.</i>	45	CCEH, DA, PWD , SO	Surveillance cameras have been operational since Fall 2021. Several challenges have occurred with the services being provided, though the vendor continues to work to overcome these issues. The vendor has presented to staff how they will provide monitoring services. A Measure X investment of \$150,000 was approved by the Board of Supervisors on November 16, 2021 to continue implementation of this strategy.		

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ENFORCE	47	Establish a well-publicized tip line, mobile app and/or other user-friendly alternative to make it easy for witnesses to report illegal dumping/dumpers and share photographic evidence when applicable. (could be linked to # 36)	45	PWD, SO	September 2021 - August 2022, PWD received 593 illegal dumping complaints through the Mobile Citizen App.
	48	Utilize centralized database to capture details related to illegal dumping found to contain address containing evidence as a means of identifying patterns and recurrences (unpermitted hauler hired by different persons at different times, same one-time excuse used in the past, etc.) for subsequent/future investigations, stings, camera installation, etc.	45	CCEH, DA, DCD, PWD, SO	<i>Strategy implementation pending the hiring of per diem deputies under Strategy #45</i>
	49	Work through the Board of Supervisors legislative platform process and/or explore partnering with coalition of other governmental agencies in the region to propose/pursue legislation to establish statewide permitting requirements for waste haulers.		BoS	<i>In the interest of facilitating ongoing regional collaboration, the Illegal Dumping Think Tank team met with Alameda County's Illegal Dumping Task Force to discuss enforcement and legislative matters of mutual interest, including advocating for statewide hauler permitting requirements.</i>
	50	Explore potential for obtaining legal authority to allow for impoundment and/or seizure of vehicles used to illegally dump.	45	SO, DCD, DA	<i>Strategy removed due to potential implications associated with individual rights and protections afforded under the Constitution.</i>
	51	Work through the Board of Supervisors legislative platform process and/or explore partnering with coalition of other governmental agencies in the region to propose/pursue legislation to change illegal dumping of non-commercial quantities (less than 1 cubic yard) from an infraction to a misdemeanor and increase the allowable penalties, including higher fines, mandatory community service time, and/or jail time.	45	BoS	<p>At a press conference on Thursday, Feb. 17, 2022, in Antioch, Assemblywoman Rebecca Bauer-Kahan (AD16-D-Orinda), District 3 Supervisor Diane Burgis, the bill's sponsor, and local county leaders announced the introduction of AB 2374. Entitled "Crimes against public health and safety: illegal dumping", the bill was introduced in response to the rampant illegal dumping plaguing communities across California.</p> <p>AB 2374 raises fines on illegal dumping of commercial quantities up to \$5,000 upon first conviction, up to \$10,000 on a second conviction, and up to \$20,000 on third or subsequent conviction. Additionally, this bill will give judges discretion to require the convicted to pay for the removal of their illegal dumping, suspend the business license of any individual convicted of dumping waste connected to their business, and allow for that person's name and name of the business to be publicly displayed as convicted of illegal dumping.</p> <p>As of 08/23/22, AB 2374 was passed by Senate/Assembly and sent to Governor for signature.</p>

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ENFORCE	52	Request courts to impose appropriate sentences (fines and community service to clean up illegal dumping elsewhere) of people convicted of illegal dumping.	45	DA	<p><i>Strategy implementation pending the hiring of per diem deputies under Strategy #45</i> <i>The City of Richmond has a team of enforcement staff exploring potential process for illegal dumping infractions to go directly to traffic court. Staff intends to keep apprised as this City effort moves forward in case there are any lessons learned may be helpful for the County</i></p>
	53	Dedicate prosecutor resources to prosecuting dumping crimes.	45	DA	<p><i>The District Attorney's Office has and will continue to expend resources to prosecute dumping cases.</i> <i>The District Attorney's Office has assigned its Environmental Sr. Inspector to be a "viewer" for the new surveillance poll cameras.</i> <i>The Sr. inspector will have access and the ability to download information from the cameras.</i> <i>In addition, the District Attorney's Office has filed a misdemeanor violation of Penal Code Section 374.3(a)(h)(1).</i> <i>This case involved an unlawful dumping of a large commercial quantity of concrete in the North Richmond area.</i> <i>The matter is presently for jury trial on September 27, 2021.</i></p>
	54	Use mapping (GIS) to track dumping hot spots to target use of enforcement tools/investigative resources.	45	PWD, DCD	<p>PWD and DCD will explore the ability for GIS tracking/geotagged reports submitted through Mobile Citizen.</p>
	55	Use sting operations targeting specific types of dumping crimes/violations or locations/days & times of day.	45	SO	<p>Discussions will take place with Sheriff's Office Resident Deputies regarding illegal dumping sting /surveillance enforcement operations in the future.</p>
OTHER	56	Continue holding interdepartmental "Think Tank" team coordination meetings quarterly, as needed. On-going coordination with cities to facilitate information sharing and collaboration opportunities (e.g. maintain/utilize countywide e-mail list, convene meetings as needed, etc.)		CCEH, DA, DCD, PWD, SO	<p><i>The second countywide "Collaborative Strategies for Reducing Illegal Dumping" meeting was held virtually on March 17, 2021. Representative from San Pablo, Concord, Pittsburg, El Cerrito, and Pinole participated in the discussion.</i></p> <p><i>Several Illegal Dumping Initiative staff participated in the Inaugural Statewide Illegal Dumping Conference virtually on the mornings of April 21st, 22nd, and 23rd.</i></p>