

Community Accountability and Engagement Plan

Keeler Community Service District 285 Old State Highway, Keeler, CA 93530

June 2023

Completed by Provost & Pritchard Consulting Group

Approved by: State Water Board | July 12, 2023

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Executive Summary

This Community Accountability and Engagement Plan (Plan) was prepared by **Provost & Pritchard Consulting Group**, the current Administrator for **Keeler Community Service District**, located at **285 Old State Highway**, **Keeler**, **CA 93530**.

This Plan provides a framework for the appointed Administrator to engage meaningfully with the community served by **Keeler Community Service District**.

The purpose of this Plan:

As Administrator, Provost & Pritchard Consulting Group (P&P), is responsible to act in the best interest of the Keeler Community Service District (CSD) and the community it serves including ratepayers, renters, and property owners. As part of carrying out its responsibility, P&P will ensure transparent, accurate, and timely communications regarding plans, actions, and priorities to bring the community water system into compliance. In addition to developing and distributing meaningful communications to the community, P&P will ensure regularly occurring opportunities exist for community members to provide input and feedback.

The main means of communication on a regular basis will be:

- The Keeler CSD's website at https://keelercsd.specialdistrict.org/.
- Direct mail to water customers.
- Water bill inserts.
- ➤ Email newsletters to community members providing project updates and other key information as needed.
- In-person or virtually via Zoom at Keeler CSD's quarterly Board Meetings held at the Keeler Volunteer Fire Department at 165 Old State Highway, Keeler, CA 93530.
- In-person or virtually via tele/video conference at Community Engagement Meetings. Community Engagement Meetings will occur quarterly and will coincide with Board Meeting dates and times.
- ➤ Community members can ask questions or provide comments by mail to Provost & Pritchard Consulting Group c/o Stephen Spencer, 455 W Fir Ave., Clovis, CA 93611, by phone Monday Friday during business hours between 7:30 AM and 5:30 PM at (559) 449-2700, or by email at keeleradmin@ppeng.com.
- Video library on YouTube with past Community Engagement Meeting recordings. Recordings will be posted to the Keeler CSD website: https://keelercsd.specialdistrict.org/ within two weeks following the meeting date.

The administrator will be reviewing questions and comments:

- Submitted by community members via mail, phone, email, and in-person at Community Engagement Meetings and will work to respond within two weeks after receipt.
- Community Engagement Meetings will include dedicated time for public comment and Q&A with P&P. P&P will field and respond to questions at the meeting or will follow-up within two weeks if additional information is needed to respond.
- ▶ P&P will keep the Keeler CSD Board informed of public comments and questions received.

The Community Accountability and Engagement Plan will include:

- Quarterly Community Engagement Meetings held at the Keeler Volunteer Fire Department, 165 Old State Highway, Keeler, CA 93530 or other appropriate locally accessible venue. The first Community Engagement Meeting took place on May 23, 2023. Thereafter, quarterly meetings will be held in July, October, January, and April.
- ➤ The Keeler CSD Board of Directors holds monthly board meetings that are open to members of the public.
- Community members can provide feedback and comment via multiple channels including by mail, phone, email, and in person Community Engagement Meetings and Board Meetings. P&P will be available to address public questions and concerns on an ongoing basis.
- A spreadsheet matrix will be developed to track and organize community member comments and questions. Questions and answers will be recorded. If it is determined that a comment needs to be addressed, the action or response will be recorded in the matrix. A summary matrix will be made available through a web-based sheet and linked from Keeler CSD's website: https://keelercsd.specialdistrict.org/community-engagement-meetings. The matrix will be updated on an ongoing basis.
- ▶ P&P will notify community members of upcoming Community Engagement Meeting opportunities via a newly created community member email distribution list, direct mail notification to community members' residences, water bill inserts, and via website posting to Keeler CSD's website at https://keelercsd.specialdistrict.org/. P&P will make reasonable efforts to provide a ten-day minimum notice to members via one or any combination of the methods listed.
- Development of a special webpage to house public outreach information related to the project: https://keelercsd.specialdistrict.org/community-engagement-meetings. This may include, but is not limited to, program and project background information, Community Engagement Meeting information, outreach flyers, past Community Engagement Meeting video

- recordings and resources, contact information for questions, comments, and feedback and a digital survey to solicit information regarding communications methods and preferences.
- A survey will be developed and distributed to community members in person at Community Engagement Meetings and online at Keeler CSD's website to solicit information from community members. The purpose of the survey is to understand community members' communications channel preferences, gather demographic information, collect email addresses for an email distribution list for meeting notices and newsletters, and obtain other general outreach methods feedback.
- Development of a project fact sheet to provide community members with key project information and background.

SAFER Drinking Water Program

Roles and Responsibilities

Administrator

All actions taken by an administrator shall be in the best interests of the community served and are intended to ensure the designated water system has adequate technical, managerial, and financial capacity to deliver an adequate supply of affordable, safe drinking water so that the services of the administrator are no longer necessary.

The specific Administrator responsibilities are detailed in the <u>Administrator Policy Handbook</u> Section 9: Obligations of Full-Scope Administrators in the Administrator Policy Handbook. For a copy of this handbook, please contact **DDW-Administrator@Waterboards.ca.gov**.

State Water Board

The SAFER Program is a set of tools, funding sources, and regulatory authorities designed to ensure Californians who currently lack safe and affordable drinking water receive it as quickly as possible:

Through its Division of Drinking Water, the State Water Board is responsible for enforcing federal and state drinking water statutes and regulating over 7,400 public water systems.

Through its Office of Public Participation, the State Water Board provides community engagement assistance to support effective public participation in State Water Board decisions and actions.

1.0 Introduction

This Community Accountability and Engagement Plan (Plan) describes the activities **Provost & Pritchard Consulting Group (P&P)** will take to meaningfully engage with the community, how the Administrator will communicate and provide project information to the community, a timeline for public participation activities and public meetings, how the Administrator will incorporate input from the community, and how **P&P** will be held accountable. **P&P** will update the Plan, as necessary, to reflect changes in this process or surrounding community.

This plan is organized in the following sections:

- Section 2.0: Keeler Community Service District
 - 2.1 Water System Issues
 - 2.2 Community Profile
- Section 3.0 Community Engagement and Communications
 - o 3.1: Public Meetings
 - o 3.2: Public Meeting Logistics
 - 3.3: Recommendations
 - o 3.4 Communication Strategies
 - 3.5 Accountability
- Section 4.0: Appendices
 - Appendix A Sample Meeting Notification
 - Appendix B Sample Meeting Agenda
 - Appendix C Sample Water Bill Insert
 - Appendix D Sample Community Survey

2.0 Keeler Community Service District

2.1 Water System Issues

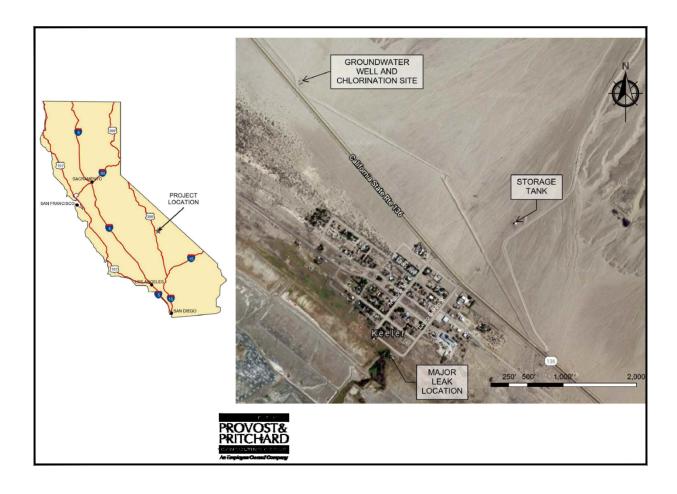
The water system is located at 285 Old State Highway, Keeler, CA 93530

(Figure 1) Water System Issues

Primary MCL Violations	Arsenic and Manganese above California State drinking water Maximum Contaminant Level (MCL) standards.
	Arsenic The running annual average for the first quarter of 2023 was 0.083 mg/L (milligrams per liter), above the MCL of 0.010 mg/L.
	Manganese The running annual average for the first quarter of 2023 was 0.088 mg/L, above the MCL of 0.05 mg/L.
Governance or Board Issues	Keeler CSD has not adequately responded to Compliance Orders issued by Inyo County Local Primacy Agency (LPA) to address arsenic and manganese levels above State and Federal MCLs. No adequate solution has been put in place and violations have been ongoing.
	The water system lacks the technical, managerial, and financial capacity to operate the water system in compliance with federal and state drinking water requirements. The Board of Directors has experienced high turnover and was unable to fill all 5 board seats for an extended period. The water system also failed to retain a certified operator to operate and maintain the system.

(Figure 2) - Keeler Community Service District Map

This map shows the Keeler Community Service District's service area. It identifies the service area boundary and the location of the source water supply well. The map also depicts the storage tank used to store and collect water, as well as the site of a major leak.



2.2 Community Profile

The **Keeler Community Services District (CSD)** serves 50 people across 67 service connections. Information regarding the demographics of the **Keeler CSD** community were obtained from census tract data obtained from <u>EJ Screen American Community</u> <u>Survey (ACS) Summary Report</u> (see attached PDF) for community is summarized in the table below.

EJSCREEN is an environmental justice mapping and screening tool that provides a nationally consistent dataset and approach for combining environmental and demographic indicators: https://www.epa.gov/ejscreen/what-ejscreen.

Table 1 – Keeler CSD Population Details^[1]

Category	Count	Percentage
Total Population	108	100%
Population Reporting One Race	94	87%
White	91	84%
African American	0	0%
Asian	1	1%
Native American	2	2%
Native Hawaiian or Other Pacific Islander	0	0%
Two or More Races	14	13%
Hispanic or Latinx	35	32%
Population by Sex		
Male	59	55%
Female	49	45%
Population 25+ by Educational Attainment		
Total	91	100%
Less than 9 th Grade	6	6%
9 th - 12 th Grade, No Diploma	4	4%
High School Graduate (25 and Older)	37	40%

Some College, No Degree	34	37%
Associate Degree	4	4%
Bachelor's Degree or more	7	8%
Linguistically Isolated Households		
Total	2	100%
Speak Spanish	0	0%
Speak other Indo-European Languages	0	0%
Speak Asian-Pacific Island Languages	2	100%
Households by Household Income		
Household Income Base	58	100%
<\$15,000	11	18%
\$15,000 -\$25,000	9	16%
\$25,000 - \$50,000	8	13%
\$50,000 - \$75,000	15	27%
\$75,000 +	14	25%
Occupied Housing Units by Tenure		
Total	58	100%
Owner Occupied	44	76%
Renter Occupied	14	24%

[1] EJ Screen Community Survey (ACS) Summary Report (Keeler CSD), U.S. Census Bureau.

The demographic information shows of those reporting as one race, 84% identify as White. The total Hispanic population is 32% and total non-Hispanic population is 68% with 60% reporting as White alone, 2% as American Indian alone, 1% as Non-Hispanic Asian alone, and 5% reporting as two or more races. In addition, 40% of the population have completed high school, and 37% have some college education, with 12% having a degree. Household income levels range from 18% having a household income of less than \$15,000, 27% having an income between \$50,000-\$75,000, and 25% having an income of over \$75,000. Since 1.9% of the population is linguistically isolated, project communications will be held in English since it is below 10% of the population.

https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30

3.0 Community Engagement and Communications

3.1 Public Meetings

It is anticipated that the community will be interested in the actions and activities of the designated Administrator because it includes work that directly impacts residents and customers within this water system. The activities described below will be conducted to provide accurate information to facilitate understanding and input.

Regular Public Meetings: P&P will host a public meeting at minimum once every three months. The public meetings will provide the community updates on the following items:

- The performance of the water system.
- The water system's financial health.
- Major projects or plans.
- Changes to water rates; and
- Other significant matters related to the designated water system.

Additional Public Meetings: Prior to taking any of the following actions, **P&P** will discuss these actions during a regularly scheduled public meeting or convene an additional meeting as needed.

- Development of Community Accountability and Engagement Plan.
- Development of Post-Administrator Drinking Water Service Plan.
- Establishing a final operating budget.
- Entering significant long-term contracts.
- Approving and/or entering contracts for significant planning projects or infrastructure improvements,
- Entering significant financing commitments, including any financing contracts with the State Water Board,
- · Adoption of final system policies, and
- Altering water rates.

3.2 Public Meeting Logistics

- Location Meetings will be held in accordance with what is convenient for the community, in-person, virtually or through a combination of in-person and virtual methods (hybrid), depending on COVID-19 public health guidelines at the time of the meeting.
- **Meeting Notice** The administrator will provide a public notice to all affected ratepayers, renters, and property owners a minimum of ten days prior to the public meeting. (See Appendix A)
- Meeting agenda The administrator will provide a meeting agenda for each public meeting (See Appendix B)

- **Meeting summaries** The administrator will provide a public meeting summary to the State Water Board within two weeks after the meeting.
- **Public comments** The administrator will provide the public with an opportunity to provide public comments at every public meeting.
- Language access services The administrator will provide translated written materials and oral interpretation in a language other than English if it is known that at least 10% of the community speaks that language or another language requested by the public.

Meeting logistics:
As of May 2023 public meetings will be held:
☐ In-person at
☐ Virtually via
At the Keeler Volunteer Fire Department, 165 Old State Hwy,
Keeler, CA 93530 (depending on availability, meetings may be
held at an alternative appropriate venue that will be noticed to
the public) and via Zoom meetings or an alternative teleconference
platform.
☐ Unsure:
□ Public meeting notice: The administrator will make reasonable effort to provide a meeting notice at least 10-days before the meeting, in the language spoken in the community and will include details that include date, time, and location or meeting platform and point-of-contact information.
☐ Meeting agenda: The administrator will provide a meeting agenda at every public meeting.
⊠ Meeting summary:
The administrator will provide a meeting summary to the State Water Board at least two weeks after a public meeting has taken place.
☐ Language access:
Based on the census tract data for the Keeler CSD community demographics, materials will be provided in the following languages:
⊠ English
☐ Spanish

☐ Other _		

3.3 Recommendations

Pre-Meeting Recommendations

- While not required, the administrator can use the sample community survey
 template to assess the level of community interest in the project, preferred ways
 to communicate, language(s) spoken, and most suitable dates and times to host
 public meetings (see Appendix D).
- Prepare *public meeting notice*, *meeting agendas*, and *water bill inserts* and/or other meeting appropriate materials (see Appendices A, B, and C).

Post- Meeting Recommendations

 While not required, the administrator could upload meeting recordings onto the water system website.

P&P will take the following pre- and post-meeting actions:
⊠ Conduct a community survey
□ Use public meeting notices
⊠ Use meeting agendas
⊠ Use bill inserts
⊠ Develop e-mail reminders
⊠ Regularly update website
⊠ Develop meeting summaries
□ Upload meeting recording to website
□ Other

3.4 Communication Strategies

It is expected that the appointed administrator implements each of the following communication strategies:

Means of communication: The administrator will provide regular updates to the
community served by the <u>best means identified</u> or recommended by community
and may include public meeting notices, newsletters, emails, the water system's
website, billing flyers, posting of flyers at central locations within the community,
community repository, and/or other similar means of communication.

- Language services: The administrator will provide written materials in a language other than English if it is known that at least 10% of the community speaks that language or another language if requested by the public. If a need for another language identified, a member of the public can request these services by contacting the office by mail: Provost & Pritchard Consulting Group, c/o Stephen Spencer, 455 W Fir Ave., Clovis, CA 93611; by phone: (559) 449-2700; or by email: keeleradmin@ppeng.com at least two weeks in advance of the meeting.
- Fact sheets/updates: The administrator will provide fact sheets/updates in easy-to-understand non-technical language and should contain graphics/visuals to facilitate understanding by a lay audience. As demonstrated in the community demographic information, fact sheets/updates will be provided in English and in other languages spoken in the community.
- **Point-of-contact:** A designated point-of-contact will be listed on *all communications materials for* the public to contact for more information regarding actions and activities.
- Mailing and key stakeholder e-mail lists: Copies of the mailing list and key stakeholder list will be provided to the administrator electronically by the State Water Board. The administrator will use the water system mailing list and key stakeholder email distribution list to mail and/or email informational materials and public meeting notices. The key stakeholder list consists of representatives from community organizations and local and state agency representatives. These lists will be updated regularly by P&P to ensure accuracy and to add the addresses of individuals who request to be on the list.

P&P has identified the following methods as the most appropriate means of communicating with this community:					
⊠ Mail					
⊠ Email					
☐ Text messages					
⊠ Fact sheets					
Newsletter ■ Newsletter					
Water system website: https://keelercsd.specialdistrict.org/					
\square Post flyers at identified centers of community (i.e., post office, markets)					
⊠ Water bill inserts					
☐ Community partners					
☐ Other					
Point-of-contact name and contact information:					

Name: Stephen Spencer

Organization: **P&P**

Address: 455 W Fir Ave., Clovis, CA 93611

Phone: (559) 449-2700

Email: sspencer@ppeng.com

Table 3 - Community Accountability and Engagement Plan Timeline

Type of Action or Activity	Description or Purpose	Timeframe
Hold Public Outreach Meeting in May 2023, then quarterly (July, October, January, and April) after the initial meeting	The meeting will be offered as a hybrid, in-person at the Keeler Volunteer Fire Department, 165 Old State Highway, Keeler, CA 93530 and via Zoom video/teleconference	Quarterly
Questions and comments can be submitted at any time via multiple communications channels, including phone, email, mail, and in person at Community Engagement Meetings	Provide clear pathways for community members to ask questions about the project, and submit their comments and feedback	Ongoing
Develop internal comment and question tracking matrix	Develop organized system to coordinate question and comment responses, and track feedback over time	May 2023
Develop email distribution list for email newsletter updates and meeting notices	Provide timely and transparent communications to community members	May 2023
Create dedicated webpage for the project at Keeler CSD's website	Create a digital location to house background information, outreach materials, upcoming event information, past event resources and recordings	June 2023
Conduct survey with community members	Understand community members' communications preferences, gather demographic information, collect email addresses, and obtain general outreach method feedback	Begin May 2023
Develop project fact sheet	Provide clear and transparent information to the community	June 2023

3.5 Accountability

The Water Boards values community input and participation. This is who we are accountable to and why.

Respond to and incorporate community Input: Community input will be documented, considered, and incorporated in the following ways:

A question and comment tracking matrix will be developed to record all questions and comments received. Community input will be reviewed and evaluated by P&P, who will summarize and record responses, follow-ups, and action items taken as necessary. Key matrix information will be reported to the Keeler CSD board at their regularly scheduled meetings and summarized and posted to the Keeler CSD website: https://keelercsd.specialdistrict.org/.

- Public access to records: The administrator shall make available the following documents to the public during business hours Monday – Friday, 8:00 AM – 5:00 PM.
- The current operating budget
- The organization chart of all designated water system employees and management
- Ownership information for the designated water system
- Reports by auditors or other financial professionals regarding the budget or finances of the designated water system
- Current contracts for professional services
- All complaints regarding water system services to customers
- Any approved Post Administrator Drinking Water Plan

Optional, such services can be offered through the establishment of an information repository at a central location in the community such as a public library, community center, school, etc. throughout the duration of the administrator. If feasible, the administrator shall make these documents available on the designated water system's website.

State Water Board Process to Submit Complaints and Petitions: Any
ratepayer, renter, or property owner who receives water from a designated water
system which receives services from the administrator is entitled to submit a
complaint or file a petition to the State Water Board for the reversal or
modification of a decision of an administrator or substitution of the administrator.

To submit a complaint contact:

Andrew Forbes, Water Resources Control Engineer

Rural Solutions Unit, State Water Resources Control Board

Phone: (559) 447-3313

Email: <u>DDW-Administrator@waterboards.ca.gov</u>

Mail: 265 W. Bullard Avenue, Suite 101, Fresno, CA 93704

To submit a petition:

Petitions may be submitted the following ways:

In person:

State Water Resources Control Board, Office of Chief Counsel 1001 "I" Street, 22nd Floor, Sacramento, CA 95814 Attn: Pamela Downing, Legal Secretary

By mail:

State Water Resources Control Board, Office of Chief Counsel P.O. Box 100, Sacramento, CA 95812-0100
Attn: Pamela Downing, Legal Secretary

By email: <u>DrinkingWaterPetitions@waterboards.ca.gov</u>

By fax: (916) 341-5199

For more information, visit: <u>Drinking Water Petitions for Reconsideration | California State Water Resources Control Board</u>

4.0 Appendices

Appendix A – Sample Meeting Notification

Appendix B - Sample Meeting Agenda

Appendix C – Sample Water Bill Insert

Appendix D – Sample Community Survey

Appendix A – Sample Public Meeting Notice

JOIN US!

ADMINISTRATOR FOR KEELER COMMUNITY SERVICES DISTRICT COMMUNITY ENGAGEMENT MEETING

Provost & Pritchard technical consultants have been appointed and funded by the State Water Board to provide safe and affordable drinking water for Keeler Community Services District.

You are invited to learn more about your drinking water, water rates, and upcoming plans to improve your drinking water system.

We will cover:

- [SPECIFICTOPICS FOR THIS PUBLIC MEETING]
 - [Example Updates on water system performance]
 - o [Example Overview of water system financial health]

Date/Time:

[DATE AND TIME]

In-Person Location: Join Online Via Zoom: Join by Phone:

[ADDRESS] [LINK TO JOIN] [PHONE & MEETING ID]

For more information, contact:

Provost & Pritchard Consulting Group Steve Spencer 559-449-2700, sspencer@ppeng.com 455 W. Fir Ave., Govis, CA 93611

Appendix B – Sample Public Meeting Agenda Template

ADMINISTRATOR PROGRAM COMMUNITY ENGAGEMENT MEETING# (Insert Meeting Number)

Provost & Pritchard Keeler Community Services District

DAY OF THE WEEK, MONTH, DAY, YEAR from 00:00 - 00:00 PM

AGENDA

- I. Introductions & Administrator Program overview
- II. Work Underway
 - a. Community Accountability and Engagement Plan
 - b. Performance of the Water System
 - c. Emergency response
 - d. Overview of the Water System's finances
 - e. Update on major projects or plans
 - f. Updates on any changes to water rates
 - g. Update on significant matters related to the Water System
 - h. Public comments, questions, and answers
- III. Public comments will be recorded and considered by the Administrator
- IV. Next projected meeting is August 2023
 - a. Look for email, website, and mail communications
- V. Adjourn

Appendix C – Sample Water Bill Insert

Dear Customer,

We would like to welcome you as a Golden State Water Company customer and let you know it is our privilege to serve you. As a new customer, your first monthly bill will be mailed by the first week of May 2023 for services rendered in April 2023.

Our goal is to make every customer service experience pleasant and easy. We hope you find the following information helpful.

Use our new Customer Self Service Portals

- MyGSWater: Sign up for MyGSWater Customer Account Portal, a self-service
 web portal where customers are enrolled in paperless billing, can access
 payment and water consumption history, schedule online payments and manage
 a personalized online profile. You can access the Customer Account Portal on a
 computer or mobile device via https://www.gswater.mygswater-cap.com
- Customer Support Portal: Submit service requests such as starting or stopping
 water service, request a pay plan, report an outage, pay bills online, track service
 request, and enroll in paperless billing. You can view the Customer Support
 Portal on a computer or mobile device via https://gswater.custhelp.com.

We offer three (3) easy ways to pay your water bill

- MyGSWater: A self-service web portal where customers are enrolled in paperless billing, can access payment history, schedule online payments and manage a personalized online profile. You can access the Customer Account Portal on a computer or mobile device via https://www.gswater.mygswater-cap.com
- 2. **KUBRA EZ-Pay**: Make one-time payments online or by mobile device using your checking account, debit or credit card, check or even cash
- 3. **PHONE:** Call our 24/7 automated payment service at 1-844-706-7690. Please have your Golden State Water account number and Phone number For more information, please visit www.gswater.com/payment-options.

Our Team of Water Professionals at Your Service

Our experience and team of water, customer service and infrastructure professionals provide a unique value to the million customers we serve in 75 communities. Golden State is a subsidiary of American States Water Company, listed on the New York Stock Exchange (AWR), one of America's leading water providers. We are regulated by the California Public Utilities Commission, the California State Water Resources Control Board, and the U.S. Environmental Protection Agency.

Best in the Class 24/7 Customer Service

Our industry leading approach to customer service includes one of the first around-the-clock Customer Service Call Centers in the industry, where the friendly voices of trained representatives are available to answer questions or address any kind of water crisis day or night. We look forward to serving you. If you have any questions, please don't hesitate to call our 24-hour customer service line at 1-800-999-4033, or Email: customerservice@gswater.com.

Sincerely,

Golden State Water Company

Appendix D- Community Survey Template

Keeler Community Service District, Community Survey

Please Print Clearly						
Full Name:						
Street Address: City, Zip:						
Add me to the email updates list for project updates and public meeting information						
Phone Number:						
1) Have you participated in any public meetings regarderice District? (circle) Yes No	rding drii	nking	g wa	ter i	ssues for Keeler Co	mmunity
If no, why not?						
2) Do you prefer in-person, virtual (Zoom), or hybrid 3) What is the best day of the week and time to hold					option) meetings?	
4) What is the best way to provide you with informa District Water System? Please rate the following con preferred and 5 = most preferred):	_		-		-	
Small group meetings/discussions	1	2	3	4	5	
Mailed fact sheets	1	2	3	4	5	
Web site/internet	1	2	3	4	5	
Newspaper	1	2	3	4	5	
Workshops	1	2	3	4	5	
Community/public meetings	1	2	3	4	5	
E-mailed information	1	2	3	4	5	
Social media (Facebook, Twitter, Instagram)	1	2	3	4	5	
Information posted in public areas	1	2	3	4	5	

5) Are there other ways for us to keep you better informed? (circle) Yes No

Please describe.